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To: The Bureau of Land Management
Attention: Coastal Plain Oil and Gas
Leasing Program Environmental Impact
Statement
222 West 7th Avenue, Stop #13
Anchorage, Alaska

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May 28, 2018

To whom it may concern,

I am writing in regards to the Bureau of Land Management's (BLM) public scoping period to assist in the preparation of an Environmental Impact Statement (EIS) for the Coastal Plain of the Arctic National Wildlife Refuge. I urge you to consider the fact that oil and gas leasing, development, production, and transportation in and from the Coastal Plain are **not** compatible with the purposes of the Arctic National Wildlife Refuge.

I recommend, "developing a responsible path forward", that focuses on protecting and preserving the wildlife and environment of the Arctic National Wildlife Refuge. The BLM has stated that they are interested in "the formation of alternatives to the proposed action within the parameters outlined in the Tax Act." One alternative that I would suggest is to reconsider the idea of oil and gas leasing on the Coastal Plain of the Arctic National Wildlife Refuge, and instead give the Coastal Plain the Wilderness designation that it so deserves.

As noted, I contend that an oil and gas-leasing program on the Coastal Plain would not be compatible with the purposes of the Arctic National Wildlife Refuge. It is my understanding that the Arctic National Wildlife Refuge is the only refuge established specifically "for the purpose of preserving unique wildlife, wilderness, and recreational values".

According to the 1980 Alaska National Interest Lands Conservation Act (ANILCA), the purposes of the Arctic National Wildlife Refuge include the following:

(i) to conserve fish and wildlife populations and habitats in their natural diversity including, but not limited to, the Porcupine caribou herd (including participation in coordinated ecological studies and management of this herd and the Western Arctic caribou herd [note in 2001- probably meant Central Arctic caribou herd]), polar bears, grizzly bears, muskox, Dall sheep, wolves, wolverines, snow geese, peregrine falcons and other migratory birds and Arctic char [note in 2001- now mostly called Dolly

Varden] and grayling;

(ii) to fulfill the international treaty obligations of the United States with respect to fish and wildlife and their habitats;

(iii) to provide, in a manner consistent with the purposes set forth in subparagraphs (i) and (ii), the opportunity for continued subsistence uses by local residents; and

(iv) to ensure, to the maximum extent practicable and in a manner consistent with the purposes set forth in paragraph (i), water quality and necessary water quantity within the refuge.

Evidently, a fifth purpose (*v: To provide for an oil and gas program on the Coastal Plain.*) was added in December 2017, with the passage of a tax bill. This additional purpose is at odds with and in conflict with the four original purposes as stated in the ANILCA. Any Environmental Impact Statement (EIS), for the Coastal Plain of the Arctic National Wildlife Refuge, must explain how the United States Fish and Wildlife Service (USFWS) and the Bureau of Land Management will address this incompatibility and make sure that purposes 1 – 4 are not diminished or compromised at all by an oil and gas-leasing program on the Coastal Plain.

In addition, the inclusion of an oil and gas-leasing program as an Arctic National Wildlife Refuge purpose may require the USFWS to prepare a compatibility determination as part of BLM's development of such an oil and gas-leasing program. It is my understanding that such a compatibility determination has yet to be prepared. This oversight needs to be rectified. Along with this concern, it must be noted that oil and gas exploration are not permitted under the current Arctic National Wildlife Refuge Comprehensive Conservation Plan (CCP). The Bureau of Land Management must acknowledge this discrepancy and describe how they plan to address this discrepancy.

When drafting an Environmental Impact Statement for the Coastal Plain of the Arctic National Wildlife Refuge, the BLM must recognize and address all the purposes of the Arctic Refuge and adhere to all stipulations and requirements of

relevant federal laws, such as ANILCA, the National Wildlife Refuge Administration Act, the Endangered Species Act, the Wilderness Act, the Wild and Scenic Rivers Act, the Clean Air Act, the Clean Water Act, and international treaties and agreements.

Impacts to the Coastal Plain do transcend United States boundaries. The draft Environmental Impact Statement for the Coastal Plain must address trans boundary impacts and how BLM plans to honor and uphold international agreements and consultation requirements, such as the 1987 agreement between the United States and Canada on the conservation of the Porcupine caribou herd and international polar bear treaties and agreements. It is vital that we uphold these agreements and treaties.

Threats from oil and gas development on the land, air, water, and wildlife – such as on the Porcupine caribou herd, in the Arctic National Wildlife Refuge, are threats to the Gwich'in of Northeast Alaska and Northwest Canada. They are unnecessary threats to the Gwich'in way of life and the future existence of their people. The Gwich'in rely on the Porcupine caribou herd for shelter, food, clothing, and life itself. The draft Environmental Impact Statement for the Coastal Plain must address all impacts on food security, subsistence rights and subsistence food availability, and resulting sociocultural effects on the Gwich'in and Inupiat people, and explain how these impacts will be mitigated and/or avoided.

Oil and gas development on the Coastal Plain of the Arctic National Wildlife Refuge, would have impacts on many people, as well as wildlife. The draft Environmental Impact Statement for the Coastal Plain must address health impacts from degraded air and water quality, noise pollution, and subsistence access. The Department of the Interior should conduct a Health Impact Assessment.

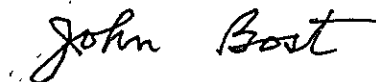
The health of the Arctic National Wildlife Refuge is at stake, as well. The draft Environmental Impact Statement for the Coastal Plain must also address and analyze the potential impacts of climate change. This includes the contribution of the proposed oil and gas leasing program to climate change from emissions on site

and potential emissions from oil and gas once shipped out of state, processed, and burned as fuel. The analysis must also account for how the Coastal Plain will be impacted by climate change..

The potential impacts of oil and gas development on the Coastal Plain of the Arctic National Wildlife Refuge are devastating. An oil and gas-leasing program in the Arctic Refuge would greatly damage and scar this precious, fragile, sacred, unique, and very special ecosystem. It is my understanding that 95% of Alaska's North Slope is already open to oil and gas exploration. The remaining 5%, the incredible land, water, air, and wildlife of the Arctic National Wildlife Refuge --- deserve protection. The Coastal Plain should be officially designated as protected Wilderness.

Protecting and preserving the Arctic National Wildlife Refuge is the wise move toward "developing a responsible path forward" for Alaska and for this unique and cherished National Wildlife Refuge.

Thank you.

A handwritten signature in black ink that reads "John Bost". The signature is written in a cursive, flowing style.

John Bost

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