

My name is Marissa Knodel, I live in Washington, D.C. and work as Associate Legislative Counsel at Earthjustice, a 501(c)3 non-profit environmental law firm that works on behalf of thousands of clients to enforce, defend and strengthen our nation's bedrock environmental laws. Today I am speaking on behalf of Earthjustice and over 36,000 of our members who have already submitted comments in opposition to oil and gas development on the Coastal Plain and anywhere within the Arctic National Wildlife Refuge.

The Arctic National Wildlife Refuge was established for the purpose of "preserving unique wildlife, wilderness and recreational values." Values such as being home to endangered species like the polar bear, the habitat for thousands of migratory birds that travel from all 50 states, and the calving grounds for the Porcupine Caribou Herd, one of the largest animal migrations in North America. The Coastal Plain of the Arctic Refuge is considered sacred by the indigenous Gwich'in people, who have sustained themselves and their culture on its land for centuries, and call it the "Sacred Place Where Life Begins." An oil and gas leasing program is fundamentally incompatible with these values.

Oil and gas drilling would have devastating and irreversible impacts on the people and wildlife for whom the Arctic Refuge is home, as well as on our climate. Recent scientific research concludes that Arctic oil and gas reserves must remain in the ground to avoid dangerous levels of global warming. Alaska is already warming twice as fast as the rest of the nation and experiencing harsh impacts, from community relocation to permafrost melt to wildfires, that will only be exacerbated if more fossil fuels are extracted and burned. In addition, oil development would emit dangerous levels of toxic pollutants that could lead to respiratory illnesses and other health problems among the Iñupiat communities that live on the Coastal Plain.

Exploration and development of oil and gas on the Coastal Plain is irresponsible and unnecessary at a time when we should be transitioning to a renewable energy future. The Comprehensive Conservation Plan, which guides management of the Arctic Refuge, was finalized in 2015 and recommended permanent protection for the Coastal Plain by designating it wilderness.

The Draft Environmental Impact Statement must include thorough and complete assessments and analyses of the potential impacts of exploration, development, and operations – including seismic surveys, land disturbance, noise, construction of supporting infrastructure, and transportation and delivery of equipment – to the land, vegetation, wildlife, air and water quality, climate, and subsistence, recreational, economic, cultural, and scientific research activities. Earthjustice requests the Bureau of Land Management include a "no leasing" alternative in its Draft Environmental Impact Statement.

Finally, the expedited timeline on which the proposed oil and gas leasing program is proceeding is reckless and dangerous. Trying to complete a thorough and accurate environmental impact statement in an area as ecologically and culturally rich and sensitive as the Coastal Plain in less than a year is simply unrealistic.

The Arctic National Wildlife Refuge must not be auctioned off to the highest bidder in the oil industry. The values for which the Arctic Refuge was established are immeasurable compared to those dirty profits. Earthjustice has and will continue to stand proudly with the Gwich'in people and the large majority (70%) of the American public who oppose drilling on the Coastal Plain, to defend it and the entire Arctic Refuge.

Thank you for your consideration of my comments.