On behalf of the Great Old Broads for Wilderness (Broads), a national grassroots organization with over 8,500 members and supporters across the country, I submit to you these scoping comments for the Leasing Environmental Impact Statement for the Arctic National Wildlife Refuge (ANWR). Broads sees the proposed drilling in ANWR as a human rights violation, an attack on rare wildlife and ecosystems, and an act that will contribute to climate-related dangers in the area and beyond. We believe it is likely not economically profitable, inconsistent with environmental legislation, and is inappropriate due to unpopular responses from the American public.

**Issues For Consideration**

1. **Great Old Broads is firm in the belief that drilling in the ANWR would violate the rights of the Gwich’in Nation.**

The section of the ANWR that is being considered for drilling leases, the Coastal Plain, is an integral piece of land to the Gwich’in Nation’s way of life. The Gwich’in people refer to the Coastal Plain as “the sacred place where life begins” and the groups existence is dependent upon whether or not drilling proceeds. A key part of the Gwich’in people’s culture and food supply is the porcupine caribou, who migrate across the entire region and give birth specifically in the Coastal Plain. Countless studies have shown that if drilling were to commence on the Coastal Plain, the caribou’s migration patterns would be disrupted and the Gwich’in people’s way of life would be left in tatters. To drill in the ANWR would continue a history that our government has of treating Native Nations and indigenous Americans as second-class citizens whose way of life is unimportant: Broads urges the Bureau of Land Management to consider the Gwich’in people in their decision. As Bernadette Dementieff, executive director of the Gwich’in Steering Committee, said, “The administration has made my people a target. We in turn give notice to those in power that the Gwich’in people will not be silent. We will not stand down. We will fight to protect the Porcupine Caribou Herd and the coastal plain of the Arctic Refuge every step of the way.” A peer-reviewed socio-economic analysis and published report should be completed on how the proposed drilling would affect the Gwich’in Nation.

2. **Drilling in the Arctic National Wildlife Refuge would further endanger already at-risk species.**

The Arctic National Wildlife Refuge is the largest wildlife refuge in the United States and as a result, is home to some of the world’s wildest and most precious wildlife. To allow oil and gas drilling in the ANWR would be to write a death sentence for much of the wildlife in the Refuge. The Coastal Plain provides important habitat for polar bears, caribou, muskoxen, and hundreds of species of migratory birds that travel from all 50 states and 6 continents. Polar bears have come to rely on the Coastal Plain to den, and allowing oil and gas drilling would further endanger a species already at risk. Furthermore, the United States and Canada signed a treaty in 1987 aimed at protecting the porcupine caribou, and Canada has come out strongly against drilling in the ANWR because it would violate the treaty. As well as the species that live in the Arctic National Wildlife Refuge, under federal legislation there are twelve endangered and eight threatened species in Alaska. The BLM should analyze how the proposed drilling will affect these species protected by federal law. While drilling will certainly impact wildlife, we have serious concerns about the infrastructure related to drilling and exploration. The environmental impact statement must analyze the number, density, and siting of roads, airstrips, and other forms of industrialization and how such development would affect wildlife in terms of habitat connectivity, interruption of migratory patterns, reproductive stress, and other factors. Air and water quality, noise pollution, and light pollution should also be evaluated. Detailed reports and analysis of peer-reviewed scientific literature regarding impacts of drilling on wildlife residing in and around the Arctic National Wildlife Refuge should be completed.

3. **Drilling in the Arctic National Wildlife Refuge would destroy unique wild lands.**

The ecosystems that the ANWR supports are incredibly rare and are important to protect for scientific, cultural, and recreational purposes. Researchers often flock to the ANWR to learn from these precious ecosystems as there is nowhere else in the United States that offers the same ecological conditions. As the largest wildland unit among all units in the U.S. National Wildlife Refuge system, ANWR provides the best example of a naturally functioning and intact community of arctic/subarctic ecosystems, with the most diverse habitats in any single protected unit in the circumpolar north. As mentioned above, many Native tribes have significant emotional and physical attachment to the land and drilling would destroy their way of life. ANWR also allows Americans from all over the country an opportunity to experience nature in its purest form. Drilling in the ANWR would permanently damage land that appears nowhere else in the United States. Drilling occurred in the ANWR only once: in the 1980’s. The oil companies removed their equipment thirty years ago but the tundra has still not recovered. If the BLM and the US government choose to allow drilling, they must be well aware that they are choosing to aid in the destruction of unparalleled and unique ecosystems. Recent comments made by government officials, like Senator Lisa Murkowski, are alarming because they ignore scientific fact and claim that drilling would have no impact on the environment or wildlife. Great Old Broads believes that as a country, we value wildlife, land, and water over a cheap economic fix. The BLM’s environmental impact statement must analyze the cumulative environmental impacts of drilling in the Arctic, including market and non-market values.

4. **Drilling would exacerbate already critical climate conditions in the Arctic National Wildlife Refuge.**

A key reason Great Old Broads has fought passionately against oil and gas drilling on public lands in recent years is because it adds to the carbon footprint of our country. Almost twenty percent of the United States’ carbon emissions come from public lands. We believe this is unacceptable; public lands should be part of the solution to climate change, not part of the problem. It has also been meticulously documented that oil and gas drilling impacts wild lands through habitat fragmentation, air and water quality degradation, noise pollution, truck traffic, and more. If drilling commences in ANWR, it will be destroyed. As man-made climate change has increased over the past few years, polar bears have been unable to den offshore and have been pushed onto land, such as ANWR. If oil and gas drilling is allowed in the ANWR, the area would only feel more climate related impacts, leading to continued destruction of habitat and denning areas for polar bear and other species. Not only does climate change harm animals in the region but the land will never recover if we continue to allow drilling. Bottom line, allowing drilling in the Arctic Refuge will contribute to climate pollution and harm land and communities that have already been severely affected from climate emissions in other areas. Great Old Broads is firm in its belief that drilling in the Arctic National Wildlife Refuge will contribute to man-made climate change and will represent an unjust action towards the wildlife, land, and communities that rely on the Arctic National Wildlife Refuge.

A full accounting of the cumulative impacts of carbon emissions resulting from drilling in ANWR should be made, including impacts on critical wildlife habitat, on reproductive requirements of key ANWR species like polar bear and porcupine caribou, and the impacts on tundra vegetation and the consequent release of methane as warming is exacerbated. Additionally, a social cost of carbon analysis should be conducted to analyze the full costs of carbon on local communities, such as on the Gwich’in Nation, if drilling were allowed to go forward.

5. **Great Old Broads finds the decision to open up ANWR to oil and gas drilling inconsistent with the National Environmental Policy Act of 1969 (NEPA).**

NEPA was crafted to prevent long term, permanent, and catastrophic global harm to the earth, and Broads believes that drilling in the ANWR would create all three. NEPA forces agencies to make decisions based upon environmental factors and Broads believes there is no evidence of the environment being considered regarding the decision to drill. Another key part of NEPA is that it requires agencies to involve those affected by legislation early and often: Broads believes federal and state agencies have not done enough to include the Gwich’in Nation and other indigenous tribes that will feel the effects of the drilling first and most severely. Related to this, Section 101, part C of NEPA states, “The Congress recognizes that each person should enjoy a healthful environment.” Broads believes, and is backed by scientific fact, that drilling in the ANWR would destroy the beautiful landscape and kill endangered species which would disrupt and, potentially, end the Gwich’in Nation’s way of life. Our country has a history of conquering and destroying Native Americans’ land and Broads sees drilling in the ANWR as a 21st century example of denying Native Americans basic rights that other Americans are granted, such as a “healthful environment.” NEPA goes on to state in Section 102 part 2A, “all agencies of the federal government shall” (a) “Utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and in decision-making which may have an impact on man’s environment.” Broads is alarmed by how little environmental science and awareness has been included in the ANWR proposal process so far and expects to see in the Environmental Impact Statement a full accounting of impacts of drilling, processing, and transporting oil. Most importantly, the EIS should demonstrate a full accounting of how the BLM plans to protect the environment.

Lastly, Broads is aware that the effort to drill in ANWR has been spearheaded by Senator Lisa Murkowski and President Trump, but have seen no action by either of them to consider the environment or adhere to NEPA. NEPA requires the President to field a Council on Environmental Quality but the current administration has left those positions open and has only recommended a new pick for the CEQ position in June 2018. Broads points all this out because it is clear that those attempting to drill in the ANWR have not followed NEPA legislation. Broads expects BLM to adhere to federal legislation, hold those who act illegally accountable, and implement the laws and policies developed to protect our environment.

6. **Great Old Broads questions whether drilling in the Arctic National Wildlife Refuge will be economically profitable.**

A full economic analysis of oil and gas extraction, including a peer-reviewed report, should be included in the Final EIS. Recently, the United States Geological Survey (USGS) estimated that there is not one large oil pool in the intended drilling area, instead there is most likely oil spread across the plain in thirty-five small traps, which would make drilling even more expensive. The only time drilling has ever commenced in the area, in 1986, the results were disappointing and it was found to not have as much oil as previously thought. Senator Lisa Murkowski and President Trump have estimated that drilling in the ANWR would create $100 billion in federal revenues. Broads has not found any scientific evidence that this could be true and expects the Bureau of Land Management to publish a thorough economic estimate of the benefits of drilling versus the economic, environmental, health, and community costs.

7. **Great Old Broads would like to see the Bureau of Land Management’s plan to handle oil spill prevention, and to properly manage and clean up an oil spill if, and when, it occurs.**

Whether it’s an Exxon Valdez**,** BP Deepwater Horizon level spill, or a smaller spill that occurs more regularly in oil fields, a prevention, clean up, and management plan should be prepared. The EIS should review and evaluate a prevention, management, and clean-up plan to protect the environment, people, and wildlife in the area when oil spills.

8. **Great Old Broads would like to see a full analysis of the expected direct and cumulative effects as defined by NEPA.**

If the BLM addresses most of the problems Broads has established in these comments then it should address the direct effects of drilling but Broads would also like to see the cumulative effects. As defined by NEPA, “Cumulative effects result from spatial (geographic) and temporal (time) crowding of environmental perturbations. The effects of human activities will accumulate when a second perturbation occurs at a site before the ecosystem can fully rebound from the effect of the first perturbation.” Broads would like to see how the BLM expects more drilling in close proximity to Prudhoe bay and other drilling sites will affect the land. Also, even though the proposed area to drill is 1.6 million acres, it will likely affect a much larger area. Broads would like to know how much of the 19 million acre refuge will be damaged as a consequence of the drilling. Cumulative effects are not always easy to calculate, but the BLM must complete a thorough investigation of the multitude of  impacts drilling will have that will affect the area, and the plans to minimize those impacts.

9. **Great Old Broads urges the BLM not to allow drilling in the Arctic National Wildlife Refuge because the American Public does not approve.**

Drilling in the ANWR does not have the support of the American public, “According to recent public opinion research commissioned by the [Center on American Progress](https://cdn.americanprogress.org/content/uploads/2017/01/18040010/E-12075-CAP-Energy-Enviro-Climate-Voters-FINAL.pdf), 2/3 of Americans oppose drilling in the Arctic Refuge, with a majority (52%) “strongly opposed.” Future congresses are likely to overturn this most recent decision because the American public is opposed to it.

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