

I am writing today to urge that the risks and effects of oil and gas exploration in the Arctic National Wildlife Refuge be taken very seriously, which means that all relevant aspects must be studied in depth in this EIS process. No leases should be sold if the risks and effects are shown to be damaging to precious resources (for example, clean water), plants, animals, people, and/or cultures.

There are many aspects of the proposed exploration that need to be taken very seriously in the EIS process. I'd like to outline four:

\* **Wildlife:** The biodiversity of wildlife living in the Arctic Refuge is extremely rich. Wildlife that makes a home there includes porcupine caribou, musk oxen, wolves, polar bears, and dozens of other land mammals. The Refuge is a home or stopover for nearly 200 species of birds, including birds that migrate to all 50 states and six continents. Therefore, risks and effects of any proposed exploration must be looked at in depth, both at the individual species level for a large number of species, and at the ecosystem level. We should also look at the degree to which we don't even have knowledge of individual species and the balance of the ecosystems there. If we know that oil and gas exploration is dangerous or damaging to any wildlife, we must take seriously our obligations to protect against those dangers. And to the extent that we don't even know what the effects might be for wildlife, we must take our obligations even more seriously.

\* **Indigenous rights:** For thousands of years, the coastal plain of the Arctic Refuge has been the home and source of life for the Gwich'in people. They depend on the porcupine caribou herd, which bears and rears calves on the coastal plain. In fact, the Gwich'in people call the coastal plain "The Sacred Place Where Life Begins." The proposed exploration's effects on the plain and the caribou need to be examined closely. In this examination, the protection of the plain and the caribou must be treated as matters of basic human rights for the Gwich'in.

\* **Sustainable tourism:** In Alaska, tourism produces \$3.9 billion of economic activity and supports 1/8th of Alaskan jobs. Average spending of the two million visitors that travel to Alaska each year is over \$1,000. And these tourism numbers continue to grow. Protecting the Coastal Plain of the Arctic Refuge not only protects a wild place for Americans to recreate, but also protects America's recreational economy, and jobs that are extremely important to Alaskans.

\* **Climate change:** The Arctic is being hit hard by climate change, with temperatures there rising twice as fast as the rest of the world. Permafrost melt is making infrastructure unstable; food sources are disappearing; villages are being eroded into the sea. The scope of the EIS must include these and other climate change effects. The EIS should carefully examine how these effects would be compounded, to start with, by the proposed exploration and proposed drilling itself. But that is just a start. The EIS must recognize that ultimately, the intent behind selling oil and gas leases is the extraction and burning of oil and gas, and therefore, the scope should include the question of whether any uptick in the burning of fossil fuels adds to the risks of climate change in the Arctic. These risks must be evaluated carefully. They must not be ignored or set aside.

Thank you for considering my comment. I urge you to listen to the majority of Americans, not to oil companies, when considering how this EIS process should be handled. The beauty, rich biodiversity, and health—as well as the rights of the native people—of the Arctic National Wildlife Refuge must be taken seriously. The scope of the EIS should reflect this. The current residents and future generations are looking to you to make the right choices.

Sincerely,

Jennifer Keller