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**[EXTERNAL] YT**

1 message

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To: blm\_ak\_coastalplain\_eis@blm.gov

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Ms. Nicole Hayes,

The Draft Environmental Impact Statement fails to comprehensively analyze the impacts of oil and gas leasing in the Arctic National Wildlife Refuge, including transboundary impacts. The DEIS understates the importance of the Coastal Plain to the Porcupine caribou herd, and suggests that drilling would not cause the Porcupine caribou to decline. The review fails to acknowledge Gwich'in in Canada when determining what communities could be "appreciably affected" by changes to population patterns in the Porcupine caribou herd.

The U.S. Government must fully address the consequences of drilling on the Porcupine caribou herd and impacts to the livelihood of the Gwich'in who rely on the herd.

The DEIS fails to address the following:

- 1) doesn't acknowledge Gwich'in communities within Canada when determining which communities would be "appreciably affected".
- 2) downplays how important the Arctic Refuge is for the Porcupine caribou herd, and doesn't properly address the importance of the Coastal Plain for caribou after they calve. The Draft Environmental Impact Statement states that the Porcupine caribou herd would not experience major impacts from drilling but provides almost no evidence to back this claim.
- 3) The Porcupine caribou herd is critical for ecosystems, communities and economies across northern Canada. Drilling in the Arctic Refuge could have serious transboundary (cross-border) impacts on Canada.
- 4) adequately address cumulative impacts. The assessment on the Porcupine caribou herd is a mere five sentences long, while the polar bear assessment devotes a single sentence to climate change.
- 5) The scenarios offered are development, development, development, or development. Each scenario opens more of the Arctic Refuge to more oil and gas. The Arctic Refuge is too important for oil and gas drilling, anywhere.

Thank you,

LeaBayliss  
Whitehorse