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BLM- ALASKA STATE OFFICE
ATTENTION: COASTAL PLAIN EIS
222 W. 7TH AVE., # 13
ANCHORAGE, ALASKA 99513-7599

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JOHN O. KOENIG
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7 MARCH 2019

BUREAU OF LAND MANAGEMENT
ALASKA STATE OFFICE
222 W. 7TH AVE., #13
ANCHORAGE, ALASKA 99513-7599

ATTENTION: COASTAL PLAIN EIS

SUBJECT: COMMENTS ON COASTAL PLAIN OIL AND GAS LEASING PROGRAM DRAFT EIS

I adamantly oppose the proposed oil and gas leasing program for the Coastal Plain of the Arctic National Wildlife Refuge. The DEIS for this proposed program is totally inadequate as outlined herein:

- 1) Oil leasing and development would destroy the wild beauty of both the Coastal Plain and adjacent designated wilderness lands in the Arctic Refuge. The DEIS fails to truthfully explain what would be lost by opening the Arctic Refuge to oil leasing and development.
- 2) The DEIS fails to describe how oil leasing and development would destroy the Arctic Refuge's ecological integrity which has flourished for eons.
- 3) The DEIS fails to fully assess the significant impacts oil leasing and development would have on caribou, especially when caribou are most vulnerable to disturbance-during critical times of calving and raising young.
- 4) Oil leasing and development on the Coastal Plain would cause caribou populations to decline, which would have significant ramifications over a vast area of Alaska and Canada, and these effects would persist beyond the estimated 130 years of exploitation. The DEIS fails to address this reality and its effects on indigenous people.
- 5) The DEIS significantly underestimates the amount of carbon pollution that oil leasing and development would add to the atmosphere, and fails to truthfully address the implications of exacerbating the climate crisis.
- 6) Fresh water is relatively limited on the Refuge Coastal Plain, however the DEIS does not adequately assess the impacts that industry's water use would have on fish and wildlife.
- 7) The DEIS does not thoroughly assess the cumulative effects of oil leasing and development within the Refuge and with current and expanding development across the North Slope and offshore in the Arctic region.
- 8) The DEIS fails to fulfill the requirements of the National Environmental Policy Act (NEPA) and therefore BLM cannot authorize leasing.

Oil and gas development does not belong in the Arctic Refuge, and I urge you not to move forward with this program. I am also deeply concerned that this process does not include a serious study of the significant impacts that oil and gas development will create for birds and other wildlife.

The Arctic Refuge is home to nearly 200 species of migratory birds. Vast numbers of birds migrate from every state and six continents to nest in the rich habitat of the coastal plain. It is also the critical calving area for the Porcupine caribou herd, providing vital insect relief and summer habitat. And this landscape is the most important onshore denning habitat for polar bears in the United States.

The Arctic National Wildlife Refuge was established to conserve these birds and wildlife, and to preserve wilderness and recreational values, subsistence use, and more. Oil development is entirely inconsistent with the original purposes of the Refuge, and it will cause lasting damage to wildlife and wilderness characteristics, and to the people who depend on them. Moreover, the fast-tracked process toward a lease sale will not allow for the full accounting of the significant impacts that will result.

I am deeply concerned about this proposed leasing program, and urge you to halt this process and end the rush to drill in the Arctic Refuge.

A handwritten signature in black ink, reading "John Koenig". The signature is fluid and cursive, with a large loop at the end of the last name.

John Koenig
Eugene, Oregon