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BLM MAIL ROOM AK-954

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BLM, Alaska Office  
Attn: Coastal Plain Oil & Gas  
Leasing Prog. EIS  
222 W. 7th Ave., Stop #13  
Anchorage, AK 99513-7599

99513-750413



9718 Sixth Avenue NW  
Seattle, WA 98117

February 3, 2019

BLM, Alaska State Office  
Attn: Coastal Plain Oil and Gas Leasing Program EIS  
222 West 7th Avenue, Stop #13  
Anchorage, AK 99513-7599

Dear Sir or Madam:

I am writing in opposition to any oil and gas leasing in the Coastal Plain of the Arctic National Wildlife Refuge. I am requesting the No Action Alternative, because according to BLM's EIS "all of the action alternatives would affect large areas of the designated terrestrial-denning unit of critical habitat for polar bears."

It is not possible to mitigate the cumulative impacts of oil and gas infrastructure and human disturbance in a region already harmed by warming at twice the rate as the rest of the nation. The EIS notes that coastal arctic habitats, such as found in the project area, are especially vulnerable to climate change. The coastal plain's current low human disturbance, combined with variable terrain with its banks and bluffs, allow a significant concentration of polar bear dens. It is expected use of this area for denning would increase with sea ice loss if left undisturbed. BLM's plans place a severely threatened species on a collision course with the oil and gas exploration and development infrastructure. The BLM admits it will not be possible to detect all the dens. Modest buffer zones will not suffice to retain the area's attractiveness as a den site.

The oil and gas infrastructure also will alter habitat for caribou mothers and calves. The nutrient-rich vegetation of the coastal plain provides essential energy for migration and nursing. The EIS states "few data are available on the effects of noise and light on caribou." This type of data, especially pertaining to caribou cows with calves, is needed before this project proceeds.

US Fish and Wildlife Service recommended wilderness protection for the coastal plain as recently as 2015. It is not credible that the federal government now seeks to allow industry to exploit this resource in such an irreversible fashion. Birds from around the world, and all our 50 states, including my home state of Washington, travel to the ANWR. There are no other places that possess the value to birds and mammals comparable with the coastal plain of the ANWR. The purpose of the national wildlife refuge system is to protect and enhance fish, wildlife, plants and their habitats for the continued benefit of the American people. BLM's EIS fails to recommend the no-action alternative, or even a minimum action alternative, that would honor the integrity and value of the National Wildlife Refuge system, and the ANWR as its crown jewel.

Respectfully,



Karen Kunde