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BLM, Alaska State Office  
Attention -- Coastal Plains EIS  
222 West 7<sup>th</sup> Avenue, #13  
Anchorage, AK 99513-7599

99513-750413



January 31, 2019

BLM, Alaska State Office  
Attention – Coastal Plains EIS  
222 West 7<sup>th</sup> Avenue, #13  
Anchorage, AK 99513-7599

Re: Extension of comment period on proposed ANWR oil drilling given the 34-day partial government shutdown and measure to be taken to ensure the species of this invaluable eco-system are not harmed

BLM Administration,

**The Alaskan National Wildlife Refuge's Coastal Plain is truly a cradle of life for many species, including pregnant Porcupine Caribou who seek its protection for their calves in May thru mid-July and the pregnant Polar Bears who in the Fall build snow dens on the Coastal Plain where they give birth.**

Therefore, we believe that any disturbance to the Coastal Plain must be carefully and deliberately considered, and I am concerned that the 34-day partial government shut-down seriously interrupted the comment period for the Draft Environmental Impact Statement for the Coastal Plain Oil and Gas Leasing Program. In order, to fulfill the policy of the National Environmental Policy Act (NEPA) the BLM **must** extend the comment period for no less than 34 days and preferably until Monday April 29, 2019, to "Encourage and facilitate public involvement in decisions which affect the quality of the human environment," to the fullest extent possible (See, 40 C.F.R. section 1500.2(d))

The Alaskan National Wildlife Refuge (hereinafter ANWR) is held in stewardship for all citizens, and this is the only conservation unit in the United States that encompasses an entire Arctic and Sub-Arctic ecosystem. The ANWR Coastal Pain is the heart of this wild Arctic ecosystem, supporting the 197,000 Porcupine Caribou Herd, millions of migratory birds, and the majority of the dwindling Polar Bear population. The unfortunate partial government shutdown critically impeded citizen input in the following ways:

- 1.) The Draft EIS was issued December 20, 2018, however, a day later funding for the Department of the Interior lapsed due to the government shutdown, and BLM's Coastal Plain e-planning page and comment portal were unavailable from December 22, 2018 to December 28, 2018. No one could access the Daft EIS during the initial days of the comment period;
- 2.) Additionally, during the partial government shutdown, BLM staff were not available to answer questions or to respond to information requests;
- 3.) Federal Agency Staff with relevant expertise who were furloughed may not have adequate time to review and to comment on the Draft EIS.

There is currently a glut in domestic oil production. Therefore, it makes sense to allow citizens and concerned experts and organizations at least the full original 45 days to comment on the Draft EIS. Extending the comment period would help fulfill the policy of NEPA and also help to dispel the common perception that this is part of an irresponsible, rushed process to put begin drilling in the Arctic Refuge without serious scientific consideration.

The stakes are very high for Arctic Cultures as well as for threatened wildlife species dependent on the ANWR Coastal Plain; the loss of even one denning mother Polar Bear and her cub would be intolerable.

1.) **Safeguards must be established to ensure that pregnant Porcupine Caribou are not disturbed on ANWR's Coastal Plain during the months of May thru July when they give birth.**

The Gwich'in people refer to the ANWR Coastal Plain as the, "The Sacred Place Where Life Begins." For over 40,000 years the Gwich'in have enjoyed a spiritual and cultural connection to the Porcupine Caribou Herd. The Coastal Plain is crucial to the survival of both the Gwich'in culture and the Porcupine Caribou for the reason that pregnant mother Caribou go there to calve because the wind from the Beaufort Sea blows mosquitos away. Mosquitos and bugs can kill a newborn calf. Gwich'in hunters have respected the calving area and work hard to give calving Caribou the privacy they need by warning off hikers and others from the Coastal Plain.

The Gwich'in culture depends on the Porcupine Caribou for sustenance. The inhabitants of the Arctic circle are "off road" that is, the only supplies from outside the Arctic Circle that reach them are brought in by plane. This makes food not taken from the land extremely expensive. The calving grounds of the Porcupine Caribou must be undisturbed to insure the continued existence of the venerable Gwich'in Culture and the Porcupine Caribou

2.) **Measure must be taken to ensure that the dwindling Polar Bear Population of the Southern Beaufort Sea is not further threatened by oil drilling operations, including steps to ensure that seismic work does not harm the snow dens of mothers and cubs.**

The deterioration of the once stable sea ice in the Beaufort Sea has forced more polar bears to den onshore on the ANWR Coastal Plain rather than giving birth on risky unstable sea ice. Dr. Steven Amstrup, Chief Scientist at Polar Bears International explains, pregnant female polar bears head to the ANWR Coastal Plain area every fall to create snow dens where they give birth to their young. If these dens are not detected during the proposed seismic work polar bear mothers and their cubs could be endangered by the heavy 90,000-pound trucks. Tragically, the Southern Beaufort Sea Polar bear population has declined to only 800 to 900 animals.

In conclusion we request that the comment period be extended so that all concerned citizens and Arctic experts be given at least 60 full days to respond to the Draft EIS with Department of the Interior financed and fully functioning and that any final EIS contain provisions to ensure that no species be disturbed during the time they use the Alaskan Coastal Plain to give birth and to raise their young.

Sincerely,

Barry K. Miller  
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Hinsdale, NY 14743