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**From:** Hayes, Miriam (Nicole) <mnhayes@blm.gov>  
**Sent:** Wednesday, March 13, 2019 8:04 AM  
**To:** coastalplainAR; Sean Cottle  
**Subject:** Fwd: [EXTERNAL] EIS Arctic National Wildlife Refuge

**Nicole Hayes**  
Project Coordinator  
Bureau of Land Management  
222 W. 7th Avenue #13  
Anchorage, Alaska 99513  
Desk: (907) 271-4354  
Cell: (907) 290-0179

----- Forwarded message -----

From: **Betty Hale** <[bettyhale@esinc.net](mailto:bettyhale@esinc.net)>  
Date: Wed, Mar 13, 2019 at 12:11 AM  
Subject: [EXTERNAL] EIS Arctic National Wildlife Refuge  
To: [mnhayes@blm.gov](mailto:mnhayes@blm.gov) <[mnhayes@blm.gov](mailto:mnhayes@blm.gov)>

From:

Elizabeth Brown Hale

718 Chub Lake Road

Roxboro NC 27573

Chaplain, retired, Presbyterian Church (USA)

Re: Environmental Impact Statement, Arctic National Wildlife Refuge

Dear Ms. Hayes:

Thank you for the opportunity to comment on the proposed Environmental Impact Statement.

Please ensure that the purposes of the Arctic National Wildlife Refuge are upheld.

Uniquely, the Refuge is “America’s finest example of an intact, naturally functioning community of arctic/subarctic ecosystems. Such a broad spectrum of diverse habitats occurring within a single protected unit is unparalleled in North America, and perhaps in the entire circumpolar north.” [US Fish and Wildlife Service] Its Final Legislative Environmental Impact Statement noted: “The 1002 area is the most biologically productive part of the Arctic Refuge for wildlife and is the center of wildlife activity” (p.46).”

Energy development is not compatible with its purposes as stated in the Alaska National Interest Lands Conservation Act: to “conserve fish and wildlife populations and habitats in their natural diversity”; to honor fish and wildlife treaty obligations; subsistence use; and to maintain water quality and quantity.

For example, the US Geological Survey has reported 4 research-based ecological arguments that “the Porcupine caribou herd [critical to subsistence and culture of the Gwich’in nation] may be particularly sensitive to development within the 1002 portion of the calving ground due to

“Low productivity of the Porcupine caribou herd...

“Demonstrated shift of concentrated calving areas of the Central Arctic caribou herd away from petroleum development infrastructures....

“Lack of high-quality alternate calving habitat....

“Strong link between calf survival and free movement of females.”

The claim that the 'footprint' of oil production would amount to only 2,000-acres or so is widely misleading, counting only the area where oil production facilities actually touch the ground, and excluding gravel mines, roads, and pipelines (except their posts). By that math, some say, “the 'footprint' of your office desk is only the 4 square inches where its legs touch the ground.”

We have international agreements with Canada to protect the Porcupine herd. As the Canadian government website explains: “This agreement is important to Canada because the Porcupine Caribou Herd is a trans-boundary species that First Nations in the Yukon and Northwest Territories rely on for sustenance. Recognition of First Nations' harvest rights associated with this Herd is well established....” Canada highlights the importance of ANWR's coastal plain “as a caribou birthing and rearing area for the well-being of the herd and its Canadian user groups.”

International law requires the United States “to protect the fundamental human rights of Native groups like the Gwich’in to culture and religion, their own means of subsistence, and health,” according to “A Moral Choice for the United States: The Human Rights Implications for the Gwich’in of Drilling in the Arctic National Wildlife Refuge.” It continues: “International human rights tribunals have ruled that governments are obligated to prevent environmental harm that would undermine these rights. For example, the United Nations’ Human Rights Committee held that a government violated indigenous people’s rights to culture and subsistence when it permitted oil and gas development that would destroy the people’s traditional hunting and trapping areas.” I commend this whole resource for your deliberations. [available online; google title]

As the fossil fuel era ends, please ensure that the purposes of the Arctic National Wildlife Refuge are upheld; that this unique and beautiful ecosystem continues to flourish; and that indigenous people's culture is honored.

Recommend that the Arctic National Wildlife Refuge be granted official wilderness designation.

With thanks, and urgently,

Elizabeth Brown Hale

718 Chub Lake Road

Roxboro NC 27573

Chaplain, Presbyterian Church (USA), retired

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