

---

**From:** Hayes, Miriam (Nicole) <mnhayes@blm.gov>  
**Sent:** Wednesday, March 13, 2019 8:05 AM  
**To:** coastalplainAR; Sean Cottle  
**Subject:** Fwd: [EXTERNAL] Comments on Draft EIS for Arctic National Wildlife Refuge Coastal Plain

**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: **Jon Miller** <[jonharveymiller1960@gmail.com](mailto:jonharveymiller1960@gmail.com)>  
Date: Tue, Mar 12, 2019 at 10:31 PM  
Subject: [EXTERNAL] Comments on Draft EIS for Arctic National Wildlife Refuge Coastal Plain  
To: <[mnhayes@blm.gov](mailto:mnhayes@blm.gov)>

3-12-19

**Comments on Draft EIS for Arctic National Wildlife Refuge Coastal Plain Oil and Gas Leasing**

Dear BLM Planning Staff:

I am spending little time on this letter not because I am unfamiliar with the coastal plain of the Refuge, nor because I do not care about its future. Neither could be further from the truth. But I have little faith in the process or intent of the EIS review process: after more than thirty years as a top conservation priority for our nation, one which a majority of Americans have consistently opposed, the back door inclusion of opening the Refuge to drilling was a desperate and undemocratic act. Now, I believe the Trump administration has instructed BLM to proceed irrespective of public sentiment or serious flaws in the process and documents, and that my comments, substantive or otherwise, are largely pointless.

Be that as it may, I offer the following comments that I believe to be both general and substantive.

1. A majority of the American people have consistently opposed opening the coastal plain of the Arctic Refuge to oil and gas leasing. Doing so is in flagrant disregard of this longstanding national public concern for this remarkable landscape and biota. For this reason alone, pursuing this unwelcome development agenda is flawed. Pursuing it at breakneck speed with inadequate time to hear from the wide array of those opposed to, and concerned about impacts from development is badly flawed. The EIS should explain why, when protecting the

coastal plain has been a top priority of biologists and conservationists across the nation for over three decades, the Trump Administration has suddenly reversed course and development is proceeding full steam ahead with little regard to public sentiment.

2. I have crossed the coastal plain from the Brooks Range to the coast a number of times. I have also traversed the entire NPRA and the coastline from the Colville River Delta to Prudhoe Bay, so I can speak to the exceptional ecological and wilderness recreation value of the Refuge coastal plain. It is, indeed, the biological heart of the Refuge and should be strictly protected at all costs. Oil development sited on the fragile, flat coastal tundra is extremely discordant with the exceptional wilderness aesthetics, adventure, and ability to fully appreciate the scenic and wildlife values of this, our largest and most ecologically intact public conservation land. It is jarringly incongruous with the values that the Arctic Refuge was established to protect. We can drill for oil in hundreds of places across this nation, but there is no part of our Arctic that matches the coastal plain for its diverse wildlife set against the backdrop of the nearby Brooks Range. Development of the 1002 lands will gut the wilderness value of the north slope of the Brooks Range, foothills, coastal plain, and coastline, and do irreparable harm to the ecological integrity of the region.

3. Anthropogenic climate change, together with nuclear war, is among the most serious and pressing threats ever faced by humanity. Alaska and the entire Arctic are the earliest to feel-, and most heavily impacted by a warming climate, the effects of which will be devastating to this fragile biome. Pumping oil from beneath the tundra and hibernating polar bears that will be driven extinct—quite likely within this century—by burning excess fossil fuels is beyond ironic. In any EIS worthy of the name, the cumulative effects of pumping MORE oil, when we should be doing just the opposite and focusing sharply on conservation, efficiency, and alternatives to burning fossil fuels should be fully explored and evaluated. This analysis should focus both on the arctic species to be impacted directly by a warming climate, and on the overall global costs (biological, sociological, and economic) of failing to curb CO2 emissions.

The cumulative effects of an over-stoked global economy are devastating the future biodiversity of our planet. This is now common knowledge among those who are paying attention. Opening the coastal plain for oil development is not only foolish and immoral, given the importance of this small region in the arctic biome, it is extremely so. I have little hope that BLM will resist this administration's directives to proceed at any cost, but I do hope that the courts will take a more considered view of this important matter.

Sincerely,

Jon Miller  
468 Line Dr.  
Fairbanks, AK 99709  
[Jonharveymiller1960@gmail.com](mailto:Jonharveymiller1960@gmail.com)