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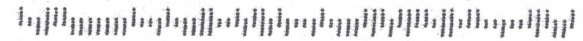
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BLM, Alaska State Office
Attention – Coastal Plains EIS
222 West 7th Avenue, #13
Anchorage, AK 99513-7599

99513-750413



February 5, 2019

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

Gentlemen:

- I. **We request extension of comment period on proposed Draft Impact Statement for Coastal Plain Oil and Gas Leasing Program and what other steps be taken necessary to:**
 - a. **Ensure measures are in place to safeguard the species of this invaluable eco-system, including the dwindling Polar Bear population of the Beaufort Sea; and,**
 - b. **To make certain that quake faults in the region such as the one responsible for the large unanticipated August 2018 earthquake north of the Brooks Range are adequately understood prior to any drilling activity**

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, it is crucial that any disturbance to the Coastal Plain be carefully and deliberately considered, and while the extension of the comment period due to the partial government shut-down was appreciated, I remain concerned that In order, to fulfill the policy of the National Environmental Policy Act (NEPA) the BLM **must** extend the comment period to 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))

- II. **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.**

A. Safeguards must be established to ensure that pregnant Porcupine Caribou are not disturbed on ANWR's Coastal Plain during the months of May thru mid- 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

B.) Measures 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.

III. The Fault of Faults such as the one responsible for the historic August 2018 earthquake that was 50 times greater than any previously measured earthquake and the magnitude of which was completely unanticipated must be better understood before oil or gas can responsibly begin.

August 2018 a strike-slip fault of a magnitude of $M=6.4$ struck in ANWR, in the pristine Coastal Plain between the Beaufort Sea and the Brooks Range mountains. While earthquakes of this nature are not surprising, the magnitude of this quake was unanticipated by the Global Earthquake Activity Rate (GEAR) that is used to forecast likely earthquake magnitude within the near future. The Alaskan Earthquake Center in Fairbanks released a bulletin stating:

Scientifically, however, this region is poorly understood and the behavior of the fault or faults responsible for today's earthquake are not known.

A competent study of any underlying, hidden faults should be undertaken. We do not want to increase the risk of inducing earthquakes in the invaluable region as has happened in Oklahoma since extensive drilling began there in about 2003.

IV. Finally, that third party insurance be mandatory for any gas or oil drilling leaseholder so that in the case of an accident or disturbance associated with oil drilling that results in the decrease of the Porcupine Caribou, Polar Bear or any other wildlife, that the Gwich'in and American citizens be fairly compensated for such a loss

Sincerely,

Nate Buckley
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