

**EXPLOITERS
FRIENDS
of ANIMALS**

Wildlife Law Program
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Centennial, CO 80112

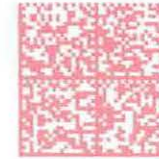
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March 7, 2019

Submitted via mail

Nicole Hayes
Attn: Coastal Plain Oil and Gas Leasing Program EIS
222 West 7th Ave., Stop #13
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[blm ak coastalplain EIS@blm.gov](mailto:blm_ak_coastalplain_EIS@blm.gov)
mnhayes@blm.gov

Comments re: Notice of Availability of the Draft Environmental Impact Statement for the Coastal Plain Oil and Gas Leasing Program and Announcement of Public Subsistence-Related Hearings, 83 Fed. Reg. 67,337 (Dec. 28, 2018).

Dear Ms. Hayes,

Friends of Animals¹, on behalf of the organization and our many members and supporters nationwide and internationally, submits the following comments in response to the December 28, 2018 Notice of Availability of the Draft Environmental Impact Statement for the Coastal Plain Oil and Gas Leasing Program and Announcement of Public Subsistence-Related Hearings (hereinafter, "Draft EIS"). 83 Fed. Reg. 67,337 (Dec. 28, 2018).

Friends of Animals represents a broad and diverse constituency that deeply believe the Arctic National Wildlife Refuge deserves a robust and fair environmental review and that oil and gas activities on the Coastal Plain will cause irreparable harm to the crown jewel of our nation's Refuge system. The Department of the Interior (DOI) and the Bureau of Land Management (BLM) fail to adequately analyze how oil and gas development would harm polar bears, water resources, caribou, and other natural systems and animals.

The draft EIS is so legally deficient that it must be substantially revised and reissued for public review and comment.² The rushed process that the agency is pursuing is incompatible with protecting the fragile environment of the Coastal Plain.

The Arctic Refuge is home to some of the most stunning populations of wildlife in the world. In addition to the Porcupine Caribou herd, polar bears, and musk oxen, hundreds of

¹ Friends of Animals is a non-profit international advocacy organization incorporated in the state of New York since 1957. FoA has nearly 200,000 members worldwide. FoA and its members seek to free animals from cruelty and exploitation around the world, and to promote a respectful view of non-human, free-living and domestic animals.

² We concur with the legal analysis provided by Trustees for Alaska et al., as set forth in their comment letter on this proposal and incorporate their legal arguments herein.

species of migratory birds make their way to the Coastal Plain for its rich and varied ecosystems and excellent denning, nesting, and forage grounds. The Refuge supports the highest density of land denning for polar bears, as melting sea ice forces bears inland. While the DOI and BLM acknowledge the importance of the Coastal Plain to wildlife, the draft EIS lacks sufficient analysis on the extent of impacts oil and gas activities would have on the animals that depend on the Refuge.

Nowhere are the impacts of climate change felt more acutely than the Arctic, which is warming at more than double the rate of the rest of the country. The draft EIS fails to assess how expanding fossil fuel development could exacerbate the impacts of climate change already at the front door of Arctic communities.

The Coastal Plain of the Arctic National Wildlife Refuge is one of our nation's most iconic wild areas and it deserves the most stringent levels of environmental review and analysis. Yet from the very beginning, the rush to lease the Refuge has come at the expense of protecting the values that make the Refuge so special. The draft EIS analysis is deficient. It does not contain the required analysis nor the necessary mitigation measures to protect the values and resources of the Coastal Plain. We are confident that a thorough and robust review of the impacts of oil and gas activities would demonstrate that an oil and gas program is simply incompatible and inconsistent with protecting wildlife. We cannot allow this process to continue and risk all the Refuge has to offer.

In conclusion, we believe that the Arctic National Wildlife Refuge should remain a symbol of America's purity. Moreover, informed people recognize that the 19.6 million-acre Refuge is a national treasure. Its abundant wildlife is worth protecting from oil and gas companies for oil we don't need. DOI and BLM should reject the proposed revisions laid out in Notice of Availability of the Draft Environmental Impact Statement for the Coastal Plain Oil and Gas Leasing Program and Announcement of Public Subsistence-Related Hearings, 83 Fed. Reg. 67,337 (Dec. 28, 2018).

Sincerely,

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