

December 16, 2020

State Director
Bureau of Land Management
Alaska State Office
222 West 7th Avenue, Mailstop 13
Anchorage, AK. 99513-7503

Comments on Notice: Coastal Plain Alaska Oil and Gas Lease Sale
[19X.LLAK930000.L13100000.EI0000.241A]

I am writing in opposition to the opening of Lease Sales on the Coastal Plain of the Arctic National Wildlife Refuge. The following are a few of my reasons for opposing the leasing action of any of the Tracts numbered 2021-CP-001 through 2021-CP-032.

1. I object to comment process for this notice. The federal register notice does not provide for electronic nor online comment. In the age of electronic communication and delays with U.S. Post Office, it appears that the Bureau of Land Management (BLM) is deliberately limiting public comment and making it difficult to provide comments, by keeping the window for comments very short and by accepting ONLY hard copy comments. It appears this action is being rushed for political reasons and is short circuiting the public review process. This process is too important to treat it with such recklessness. The secret opening of bids also limits the public involvement in this process.

2. The Coastal Plain is critical denning habitat for the Southern Beaufort Sea (SBS) polar bear populations. The best technology for detecting polar bear dens is only about 50 percent accurate, meaning there's a high probability of seismic survey disturbing undetected dens. Seismic testing will cause vibrations throughout the area, which may adversely affect the success of denning and rearing of young. With melting sea ice and accelerated climate change, the bears will become more dependent upon coastal habitat to meet the needs of their life cycle. A recent study released by the USGS, Atwood, T.C., Bromaghin, J.F., Patil, V.P., Durner, G.M., Douglas, D.C., and Simac, K.S., 2020, Analyses on subpopulation abundance and annual number of maternal dens for the U.S. Fish and Wildlife Service on polar bears (Ursus maritimus) in the southern Beaufort Sea, Alaska: U.S. Geological Survey Open-File Report 2020-1087, 16 p., <https://doi.org/10.3133/ofr20201087>, concludes "As sea ice becomes a less stable substrate in winter, the frequency of land-based denning by SBS polar bears likely will continue to increase."

3. Economic Factors. Over the past year Goldman Sachs, JPMorgan, Chase, Wells Fargo, Citi, Morgan Stanley and Bank of America have all committed against funding drilling in the Arctic National Wildlife Refuge, joining more than two dozen global banks that have also prohibited financing Arctic drilling projects. If the major financial institutions are not willing to finance oil development in the Arctic National Wildlife Refuge, why is the BLM even proceeding with actions that involve lease sales, winter seismic exploration and developing oil resources in the Refuge? If a project is not able to obtain financing, it should NOT be considered a viable action alternative. Public funds should not be used to execute this lease sale process.

4. The Gwich'in refer to the Coastal Plain as "Iizhik Gwats'an Gwandali Goodlit" or the "sacred place where life begins. The Gwich'in culture, history, spiritual and subsistence needs are linked to the Porcupine caribou herd. The Porcupine caribou herd utilizes the Coastal Plain as their calving grounds. The Porcupine caribou are vital to their culture and their traditional way of life, on their traditional lands. Gwich'in have been actively fighting the oil development

5. The narrow strip of tundra in the Coastal Plain is of national and international significance to millions of migrating and nesting birds. The two maps below, from the Arctic National Wildlife Refuge website, illustrate how birds migrate thousands of miles, from around the nation and the globe to the Coastal Plain each year, to complete their breeding cycle. If this habitat is altered or diminished by oil extraction activities, or if these birds are disturbed during their short nesting period, the birds lifecycles and populations have a high potential to be negatively impacted.

13 numbered migration routes of birds from the Arctic region. The routes are color-coded and numbered 1 through 13. Route 1 is a red arrow pointing southwest to Africa. Route 2 is an orange arrow pointing southwest to Europe. Route 3 is a yellow arrow pointing southwest to Asia. Route 4 is a green arrow pointing southwest to Australia. Route 5 is a light green arrow pointing southwest to the Pacific. Route 6 is a yellow arrow pointing southwest to the Pacific. Route 7 is a green arrow pointing southwest to the Pacific. Route 8 is a blue arrow pointing southwest to the Pacific. Route 9 is a blue arrow pointing southwest to the Pacific. Route 10 is a purple arrow pointing southwest to the Pacific. Route 11 is a green arrow pointing southwest to the Pacific. Route 12 is a purple arrow pointing southwest to the Pacific. Route 13 is a green arrow pointing southwest to the Pacific.

1. Northern Wheatear	8. Sandhill Crane
2. Red-throated Loon	9. Brant
3. Common Yellow Wagtail	10. Smith's Longspur
4. Arctic Skua	11. American Golden Plover
5. Redpoll	12. Tundra Swan
6. Redpoll	13. Semipalmated Sandpiper

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