Dear Ms. Hayes,

We, the undersigned organizations representing millions of members nationally and internationally, respectfully request additional public hearings during the public comment period for the Bureau of Land Management’s (BLM) 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). The Arctic Refuge is held in stewardship for all citizens as one of the crown jewels of America’s public lands system. The currently planned hearings fall short of giving the public at large a say on these proceedings. To rectify this, we request hearings in the following locations to ensure that people from areas around the country can have their voices heard on the importance of protecting the Coastal Plain: Albuquerque, New Mexico; Denver, Colorado; Seattle, Washington; and Minneapolis, Minnesota.

The commitment of our community of millions of American members — each of whom is a co-owner of this extraordinary wildlife refuge — and our international members — who have an interest in this internationally recognized area — is strong. Our interest and commitment to protecting the Refuge is also longstanding; together, this community has advocated for a legislative wilderness designation for the Coastal Plain for nearly forty years. Our members are likewise dedicated to participating in BLM’s lease sale review process. As BLM is aware, more than 700,000 public comments were submitted during the scoping phase strongly opposing all oil and gas activities on the Coastal Plain.

Public participation is a core purpose of NEPA. BLM must ensure adequate opportunity to engage the public in each step of this process. It is imperative that BLM ensure that any process to consider leasing on the Coastal Plain allows for robust participation by the interested public. During the scoping hearings, Department of Interior officials indicated that they would be open

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1 40 C.F.R. §§ 1500.2(d), 1506.6.
to requests for additional hearings on the draft EIS. Additional hearings would help to ensure
meaningful participation in this process by the interested public across the nation.

BLM’s press release announcing the draft environmental impact statement (EIS) indicated that
hearings will take place in Anchorage, Arctic Village, Fairbanks, Kaktovik, Fort Yukon, Venetie,
and Utqiagvik, Alaska, and Washington, D.C. We support a robust schedule of meetings
throughout Alaska. But because the wildlife refuge is owned by all Americans and given the
significant national interest in protecting its exceptional resources and opposition to oil and gas
in the Coastal Plain, there is both substantial controversy concerning the proposed action and
substantial interest in holding additional hearings.3

We also request that notice of the hearings be provided at least two weeks prior to the hearing
date to give our members and the public sufficient time to prepare remarks. Ensuring that the
public has sufficient time to review the draft EIS and related documents prior to the hearings is
essential to the public’s ability to provide substantive comments during the hearings, as
requested by BLM.

Many of our groups also submitted a request for a comment extension on December 21, 2018.
The Federal Register notice stated that the comment period is until February 11, 2019, 45 days
from publication. We requested an extension to submit comments for this important process until
Monday, April 29, 2019. BLM has yet to respond to this request. We reiterate it here, with the
additional request that the public comment period also be extended to account for the
government shutdown, i.e., 77 days plus the number of days that the government was shutdown.

Additional time and hearings are particularly important because of the partial government
shutdown. At the end of the day on December 21st, funding for the Department of the Interior
lapsed. Despite agency guidance that websites are to remain active during a shutdown, BLM’s
Coastal Plain e-planning page and comment portal were unavailable for at least 6 days during
that time (Dec. 22–26 and Dec. 28), meaning that no one could access the draft EIS and related
documents or utilize the commenting portal. In addition, BLM staff have not been available to
answer questions and respond to information requests. Concerted efforts on BLM’s part must be
made once BLM is up and running once again to make up for the lack of staff and online
availability during the shutdown. An extension of the public comment period will also ensure
that other federal agency staff with relevant expertise who have been furloughed have adequate
time to review and comment on the draft EIS. Adding public hearings will also help make up for
the impact of a shutdown on the public’s ability to comment and participate, as will extending
the comment period to account for the shutdown period, in addition to the pending 77-day
extension request.

In sum, we request that additional hearings be held in Albuquerque, New Mexico; Denver,
Colorado; Seattle, Washington; and Minneapolis, Minnesota, and that you provide at least two-
weeks’ notice of all hearings so that people can adequately prepare and meaningfully participate.
We also repeat our request for an extension of the public comment period. Please confirm
receipt of this request.

3 40 C.F.R. § 1506.6(c).
Sincerely,

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Alaska Wilderness League

Ed Schmitt
President of the Board
Alaska Wildlife Alliance

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