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March 4, 2026

Wayne Svejnoha
Alaska State Office
Bureau of Land Management
222 West Seventh Avenue, Stop #13
Anchorage, Alaska 99513-7504
Submitted Via Email to BLM_AKSO_AK932_AKLeasesales@blm.gov

Re: Comments on the Call for Nominations and Comments for the 2026 Coastal Plain Oil and Gas Lease Sale, 91 Fed. Reg. 4937 (Feb. 3, 2026)

Dear Mr. Svejnoha:

On behalf of the Northern Alaska Environmental Center (Northern Center), we submit the following comments regarding the Bureau of Land Management's call for nominations and comments related to the proposed oil and gas lease sale in the Coastal Plain of the Arctic National Wildlife Refuge.

The Northern Center is an Alaska nonprofit environmental organization founded in 1971 with 418 members, approximately fifty-six percent of whom reside throughout Alaska. The organization's mission is to promote conservation of the environment and sustainable resource stewardship in Interior and Northern Alaska through education and advocacy, with the goal of ensuring that Alaska's globally significant wildlands remain healthy, biologically diverse, and productive for present and future generations.

Throughout its history, the Northern Center has engaged constructively in federal and state decision-making regarding resource development in Alaska. The organization recognizes that resource extraction plays a role in Alaska's economy and has long advocated for responsible development that protects wildlife, respects Indigenous communities, safeguards subsistence resources, and maintains the ecological integrity of the landscapes on which Alaskans depend. When development proposals fail to meet these standards, however, it is critical that agencies decline to move forward.



Oil and gas leasing in the Coastal Plain of the Arctic Refuge represents such a case.

The Arctic Refuge is one of the most intact ecosystems remaining in the United States. Its Coastal Plain provides critical habitat for the Porcupine Caribou Herd, denning habitat for polar bear, and essential breeding and migratory habitat for millions of birds that travel across continents.¹ The Coastal Plain serves as the primary calving ground for the Porcupine Caribou Herd—one of North America’s largest migratory caribou populations, numbering roughly 200,000 animals—which migrates hundreds of miles each year to give birth in this region.

²Scientific assessments have found that industrial development in these calving grounds has the potential to reduce calf survival and disrupt critical habitat use patterns.³

This landscape is also sacred to the Gwich’in people, whose culture and food security are closely tied to the health of the Porcupine Caribou Herd. For generations, the Gwich’in have referred to themselves as the “Caribou People,” reflecting the deep cultural and subsistence relationship between their communities and the herd that depends on the Coastal Plain.⁴

The Bureau of Land Management’s effort to advance another lease sale in this region once again places irreplaceable lands, Indigenous rights, and fragile Arctic ecosystems at risk.

Financial Risk

Recent leasing history demonstrates weak economic viability for oil and gas development in the Arctic Refuge. The first lease sale held in January 2021 generated approximately \$14 million in bids—far below earlier federal projections—and most of the leases were purchased by a state-owned development authority rather than private

¹ U.S. Fish and Wildlife Service. *Arctic National Wildlife Refuge: Wildlife and Habitat Overview*. U.S. Department of the Interior.

² U.S. Fish and Wildlife Service. *Porcupine Caribou Herd*. Arctic National Wildlife Refuge Species Profile.

³ Griffith, B., et al. 2002. “The Porcupine Caribou Herd.” In *Arctic Refuge Coastal Plain Terrestrial Wildlife Research Summaries*, U.S. Geological Survey.

⁴ National Wildlife Federation. *The Gwich’in and the Porcupine Caribou Herd: Cultural and Subsistence Importance*.



industry.⁵ A second mandated lease sale held in January 2025 received no bids at all.⁶ These outcomes reflect the significant economic uncertainty associated with Arctic oil development, including high infrastructure costs, logistical challenges, and a rapidly evolving global energy market.

High Costs and Long-Term Liability

Arctic oil development requires enormous upfront investment, extensive infrastructure, and long timelines before production could occur. Exploration and development activities can take a decade or more before reaching production, with substantial environmental disturbance occurring well before any economic return is realized.⁷ These projects carry significant financial risk and may ultimately leave taxpayers responsible for long-term environmental liabilities associated with infrastructure and remediation.

Environmental Risk

The Arctic Refuge's fragile ecosystems, extreme conditions, and limited infrastructure make industrial development particularly difficult and risky. The region supports globally significant wildlife populations and complex ecological systems that are highly sensitive to disturbance. Any industrial accident or spill in this remote environment would have disproportionate and potentially irreversible environmental consequences.

Indigenous Rights and Community Impacts

The Coastal Plain of the Arctic Refuge is sacred to the Gwich'in people and central to their culture, identity, and subsistence way of life. Development that threatens the Porcupine Caribou Herd or disrupts this landscape risks undermining Indigenous rights, food security, and cultural continuity for communities that have depended on this ecosystem for generations.

Climate Considerations

⁵ Congressional Research Service. 2021. *Arctic National Wildlife Refuge (ANWR) Oil and Gas Leasing Program*.

⁶ U.S. Department of the Interior. 2025. *Arctic National Wildlife Refuge Second Lease Sale Results*.

⁷ National Petroleum Council. 2015. *Arctic Potential: Realizing the Promise of U.S. Arctic Oil and Gas Resources*.



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Oil and gas development in the Arctic Refuge would further contribute to climate change in a region already experiencing some of the fastest warming on Earth. Arctic temperatures are rising significantly faster than the global average, contributing to widespread permafrost thaw, sea ice loss, and ecosystem change across northern Alaska.⁸ Expanding fossil fuel infrastructure in this region increases the risk of additional environmental disturbance while contributing to global greenhouse gas emissions.

Taken together, these factors demonstrate that advancing oil and gas leasing in the Coastal Plain of the Arctic Refuge does not meet the standard of responsible development that Alaskans expect. The risks to wildlife, subsistence resources, Indigenous communities, and the broader Arctic ecosystem are too significant, while the economic justification for development remains uncertain.

For these reasons, the Northern Center urges the Bureau of Land Management to halt efforts to advance oil and gas leasing in the Coastal Plain of the Arctic National Wildlife Refuge and to prioritize the long-term protection of this globally significant landscape.

Thank you for the opportunity to provide comments.
Sincerely,



KRYSTAL LAPP
BOARD PRESIDENT
NORTHERN ALASKA ENVIRONMENTAL CENTER

⁸ Intergovernmental Panel on Climate Change (IPCC). 2019. *Special Report on the Ocean and Cryosphere in a Changing Climate*.

