

**Alaska Wildlife Alliance · Alaskans FOR Wildlife · Arctic Audubon Society · Audubon
Alaska · Conservation Lands Foundation · Defenders of Wildlife · Friends of Alaska
National Wildlife Refuges · Gwich'in Steering Committee · Native Movement · Northern
Alaska Environmental Center · Trustees for Alaska**

March 30, 2020

The Honorable David Bernhardt
Secretary, Department of the Interior
1849 C Street, N.W
Washington, DC 20240

**Re: Request for an immediate suspension on all public comment periods, policy decisions,
and oil and gas lease sales during the COVID-19 National Health Emergency**

On behalf of the above-listed organizations and our Alaskan members, we request the Department of Interior (DOI) and the agencies it oversees immediately suspend all public comment periods, major policy decisions, changes to regulations, and oil and gas lease sales and decisions in Alaska and nationally for the immediate future. We also write to express our strong disapproval of DOI continuing to open comment periods at a time when Alaska and the rest of the world are in the midst of a global pandemic. It is unconscionable for the Trump Administration to move forward with these actions at a time when the public is struggling to meet their basic needs.

President Donald J. Trump has declared a “national health emergency” to address the COVID-19 virus. The nation’s attention is rightfully focused on keeping our families healthy and safe.

Many schools are closed, which means parents are focused on childcare and homeschooling. Workplace activities have been disrupted, making it difficult for many people to participate in business-as-usual activities. Library closures mean citizens without computers cannot review environmental assessment documents.

In Alaska, Governor Dunleavy has put in place numerous restrictions limiting the public’s ability to gather, work, and travel. For example, the Governor recently enacted a requirement that all travelers returning to the state self-quarantine for a period of two weeks, as well as social-distancing and intrastate travel restriction policies.

Many individual communities have enacted even more stringent restrictions. Anchorage has a “hunker down” order, Minto has closed the road to the village, and many villages and Tribal

Councils, as well as the North Slope Borough, have banned non-essential travel to and from their communities. All of these restrictions will make it extremely challenging, if not impossible, for individuals to engage in public meetings or to devote resources toward engaging in these processes when there are more pressing health, family, and other matters. Alaska's emergency room directors have called for the government to put a halt to nonessential air travel, including in-state travel. For many communities in Alaska, there are serious limitations on health care resources, which are being exacerbated by the current outbreak of COVID-19. Communities are also using all existing resources to prepare and address this health crisis. DOI's decisions to move forward with public comment periods, such as the Supplemental EIS comment period on the Willow Master Development Plan, that the Bureau of Land Management (BLM) just opened in the middle of this crisis, is directly at odds with its obligation to meaningfully involve the public in its decision-making processes.

As the American public is stepping up in incredible ways to do our part to limit the COVID-19 outbreak, the DOI instead appears to be more focused on advancing oil and gas interests and abusing the situation to avoid public scrutiny and input on its actions. They have given no indication that they plan to curtail project development for the immediate future as evidenced by the recent release of EIS documents for comment.

Alaska is particularly vulnerable to this current health crisis and DOI's business-as-usual approach appears highly opportunistic. To put this in perspective, Senator Natasha von Imhof recently said in an Alaska legislative hearing on Saturday March 21, "Alaska is experiencing a perfect storm. A most terrible trifecta. The hat trick from hell. We are being hit on all sides with the stock market crash, oil prices plummeting, and the tourism and fishing season all but idle."

Much of Alaska struggles with access and bandwidth in their telecommunications infrastructure and thus their ability to adequately participate in virtual meetings. This is especially true for those Alaskans who will be most directly affected by DOI projects, such as the Willow SEIS, but is also true for many Alaskans in and around our city centers who are not served by broadband internet providers. Public reading rooms are closed. Libraries are closed. NEPA documents are large and the files are not easy to download, or read, especially on phones that many Alaskans use to access the internet since they lack computers. Additionally, meaningful public participation requires in-person public meetings, especially in rural Alaska communities, which would be significantly impacted by DOI proposals.

Furthermore, there is particular historical trauma in Alaska Native and Native American communities related to pandemics. Here in Alaska, communities were dramatically affected by the 1918 Spanish Flu pandemic, when entire villages were killed by the disease. Now is a time for concern for our families and their safety and making sure that our villages stay healthy and

have access to medical care. It is inappropriate in the highest degree to be forcing people to comment on or review documents and decisions, and the future health of their lands and access to resources at this time.

In a floor speech in the Alaska State Senate on March 19, Senator Donny Olson spoke about the danger travel to rural Alaska poses for people there. “I have made the decision that my family of eight will not return to Golovin right away,” he said. “The risk is too high that we carry the virus back to our small village of 100 people.”

“The village of Shishmaref in 1918 blocked off the dog team trail into its town when it heard word of the virus and posted armed guards after setting up a barrier to halt anybody going into the village of Shishmaref. The guards outside the village refused to allow anybody in. These actions saved all the lives in Shishmaref apparently without loss of life,” he said. “The village of Wales was not so lucky. When the flu reached that village, there was no stopping it. It killed five out of every seven people in the village. Bodies went unburied. Families frantically reorganized to try and avoid being forced from the village. The trauma at that time is still felt today.”

In Alaska, as across the country, there is already clear precedent and strong demand to suspend non-essential actions in order to focus entirely on pandemic response. The Alaskan supreme court on March 23 made sweeping changes to the way our courts work in order to protect the public, suspending hearings unless they are essential. The DOI should make a similar policy announcement, suspending project development, policy decisions, and comment periods unless deemed essential to respond to the pandemic and protect health and safety.

In order to protect Alaskans and ensure the best use of our public resources, we call on the DOI to take the following actions:

Delay comments periods, and new and pending policy proposals or decisions, until it is safe for the public to participate in public meetings and provide input. This should include the recently opened comment period on the Willow MDP SEIS, Ambler Record of Decision, and the Record of Decision on the Arctic National Wildlife Refuge Coastal Plain Oil and Gas Leasing Program.

Stop oil and gas lease sales. The federal government has already lost billions of dollars to oil and gas over the last decade. Selling our leases at “current market” (read: discounted) rates doesn’t make any sense right now, nor does moving ahead with lease sales that require public comment and input in the midst of an all-consuming crisis. BLM has been pushing lease sales through in Western US states since this crisis started, selling off rights to public resources for as low as \$2 per acre. This does not approach the bar of being in the public interest, and it would be a great tragedy if the Arctic National Wildlife Refuge were permanently marred as a result.

Close the national parks, except to subsistence. Many park managers have already chosen to close their parks and/or key visitor facilities, but those that remain open will face an influx of visitors all attempting to socially distance themselves in the great outdoors, potentially without knowledge of the latest park conditions (because the visitor centers are closed). Along with potentially increased traffic in parks and inevitable social interactions on popular trails, park rangers who will be directly interacting with park visitors will continue to be at greater and needless risk. We need to close the parks for the safety of the staff and the public.

Sincerely,

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