

# 1. Introduction

The public comment period on the Draft Revised Comprehensive Conservation Plan (Plan, Revised Plan) and Draft Environmental Impact Statement (EIS) for Arctic National Wildlife Refuge (Arctic Refuge, Refuge) ran from August 15 to November 15, 2011. This report summarizes the public comments we received (Section 2 below) and lists all the comments that were identified as requiring a response from the Service (Section 3 below). The Service's responses to these comments will be published with the Revised Plan and Final EIS. We have also provided copies of select comment letters in the appendices to this report.

## 2. Summary of Comments

### 2.1 Comment Response Process

We received communications on the Draft Revised Plan via email, mail, fax, hand delivery, the project website (<http://arctic.fws.gov/ccp.htm>), telephone, form letter campaigns from Non-Governmental Organizations (NGOs), and via oral and written communications at public hearings and community meetings. Every communication we received was read by Refuge staff or project planners and by AECOM, a third party contractor hired to analyze public comments. All communications were organized and reviewed, and the following information was collected:

- the alternative the commenter preferred;
- whether the commenter generally supported Wilderness, oil and gas development, or had no stated preference; and
- whether the commenter stated they had personally used the Refuge for subsistence, hunting/fishing, other recreational use, as a commercial guide, or had a non-identified use (for example, stated that they had visited the Refuge, but did not say what they did while they were there).

All communications were further reviewed for sections, paragraphs, and sentences that would require a response from the Service. Comments requiring a response are known as “substantive comments<sup>1</sup>.” For the purposes of the Revised Plan, and in accordance with the Council of Environmental Quality's (CEQ's) National Environmental Policy Act (NEPA) implementing regulations, we defined substantive comments as those that:

- question, with reasonable basis, the accuracy of the information in the EIS or EA;
- question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis;
- present new information relevant to the analysis;
- present reasonable alternatives other than those analyzed in the EIS or EA new ideas for the alternatives, and/or
- cause changes or revisions in one or more of the alternatives.

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<sup>1</sup> Throughout this summary the term ‘communication’ refers to an individual submission, for example, an electronic mail (email), letter, phone record, form letter etc. The term ‘comment’ refers to a section within any communication that was identified as either requiring a response from the Service (substantive) or not requiring a response (non-substantive).

Comments that are not considered substantive or do not require a response include the following:

- Comments in favor of or against the proposed action or alternatives without providing the types of reasons that meet the criteria listed above (such as “we disagree with all the action alternatives and believe the Service should select Alternative A”)
- Comments that only agree or disagree with Service policy or resource decisions without providing justification or supporting data that meet the criteria listed above (such as “more permits should be authorized”)
- Comments that don’t pertain to the planning area or the Plan (such as “the government should eliminate all oil and gas development in the Beaufort Sea,” when the Plan is about management of Arctic Refuge)
- Comments that take the form of vague, open-ended questions

A communication could contain both substantive and non-substantive sections. Non-substantive comments (i.e., those that do not require a response from the Service) are summarized in Section 2.4, which also includes examples of such comments. Although we read and coded non-substantive communications, the Service did not respond to these comments and they are not included in Section 3.

All communications were organized so that an objective analysis and presentation of the comments could be made. Each was assigned a unique identifying tracking number and entered into a database where substantive comments were sorted into topics and sub-topics. Many people chose to comment using form letters prepared by various organizations. Only one copy of each form letter was reviewed for substantive comments (see Appendix A). However, all communications received on the Draft Revised Plan are being kept by the Service as part of the planning record.

The Service also received thousands of communications that were not specific to the Plan, such as postcards celebrating the Refuge’s 50<sup>th</sup> anniversary or letters in support or opposition to certain bills in Congress. The Service has retained these documents, but they were not reviewed as part of the comment analysis process for the Revised Plan.

All communications received during the Revised Plan’s scoping period and those received on the Draft Revised Plan will be reviewed again in preparation for upcoming step-down plans, such as the Visitor Use Management Plan and the Wilderness Stewardship Plan. The Service will look specifically for comments relevant to each step-down plan. Communications considered non-substantive for this EIS process, and therefore not addressed in the Revised Plan, could be considered relevant to the step-down plans and would be included in these separate analyses.

## **2.2 Quantitative Analysis of Communications Received**

### **2.2.1 Overview**

Approximately 612,265 individual communications (an individual piece of mail, website submission, form letter, statement at a public hearing, etc.) on the Draft Revised Plan were received during the public comment period. Of these communications, 1,990 were original statements (30% from Alaska) and 610,275 were form letters. A total of 1,303 comments requiring a response from the Service were identified. Only 339 of the communications we received contained such comments. These comments can be found in Section 3.

We received form letters via email, mail, or on compact disc (CD) from NGOs. The total number of form letters includes an unknown number of duplicate comments. The form letters were provided to the Service in several different formats and each individual communication was counted, resulting in some duplication. Some individuals may also have submitted the same comment several times using the same or different submittal method (e.g., submitting a form letter multiple times, or sending a letter by mail and email).

Of the form letters, approximately 610,000 communications reflected the views of, and closely mirrored language suggested by, advocacy groups including:

- Defenders of Wildlife, including those submitted through the Care2 website (97,265)
- Greenpeace, including those submitted through the Change.org website (87,997)
- Sierra Club (85,344 in five different formats)
- Natural Resources Defense Council (59,585)
- Center for Biological Diversity (52,915 in two different formats)
- The Wilderness Society (52,770)
- Alaska Wilderness League (49,048 in four different formats)
- Save Our Environment Action Center (42,596 in two different formats)
- National Wildlife Federation Action Fund (24,058)
- League of Conservation Voters (18,060)
- Audubon Society (17,829)
- CREDO (16,078)
- Endangered Species Coalition, including those submitted through the Change.org website (2,788 in two different formats)
- Wilderness Watch (1,143)
- Pacific Environment (815)
- National Wildlife Refuge Association (725 in two different formats)
- Resource Development Council (628 in two different formats)
- Operators Local 375 (205)
- Gwich'in Nation (100)
- Republicans for Environmental Protection (78 in two different formats)
- Friends of Alaska National Wildlife Refuges (4)

A small number of form letters came from unknown sources.

### **2.2.2 Public Hearings**

Public hearings on the Draft Revised Plan were held in six locations (Anchorage, Fairbanks, and four villages located near the Refuge) as listed in Table 1. At each meeting, we made available copies of the Draft Revised Plan and the separately bound “Planning Update 3: Summary of Draft CPP, June 2011” for the public to review and take home. Written communications were accepted at all meetings, and we provided writing materials for attendees to submit communications on site.

Three types of public meetings were held:

- Open House = posters on display, PowerPoint presentation played on loop, and Service staff available to answer questions.
- Community Meeting = posters on display, PowerPoint presentation given at meeting, and public question and answer session between Service staff and attendees during which comments were captured on flip chart paper.
- Public Hearing = formal testimony recorded and transcribed.

Table 1. Draft Revised Plan Meeting Locations, Dates, Types, and Attendance

Location	Type/Date/Time	Number of Non-Speakers <sup>1</sup>	Number of Speakers <sup>2</sup>	Total Attendees
<b>Anchorage</b>				
<b>US Fish and Wildlife Service Regional Office</b>	Open House: 9/20/2011 3-9pm	39	n/a	39
<b>Wilda Marston Theatre</b>	Public Hearing: 9/21/2011 3-9.30pm	75	71	146
<b>Fairbanks</b>				
<b>Pioneer Park Civic Center</b>	Open House: 8/24/2011 3-9pm	51	n/a	51
<b>Carlson Center</b>	Public Hearing: 10/19/2011 3-9.30pm	59	102	161
<b>Arctic Village</b>				
<b>Community Hall</b>	Community Meeting <sup>3</sup> : 10/4/2011 5-9pm	67	n/a	67
<b>Community Hall</b>	Public Hearing: 11/14/2011	6	4	10
<b>Fort Yukon</b>				
<b>Tribal Hall</b>	Community Meeting & Public Hearing <sup>3</sup> : 10/28/2011 5-9pm	23	11	34
<b>Kaktovik</b>				
<b>City Hall</b>	Community Meeting <sup>3</sup> : 10/25/2011 5-9pm	22	n/a	22
<b>City Hall</b>	Public Hearing: 11/3/2011	24	6	30
<b>Venetie</b>				
<b>Community Hall</b>	Community Meeting: 9/1/2011 5-9pm	20	n/a	20
<b>Community Hall</b>	Public Hearing: 11/15/2011	1	3	4
<b>Totals</b>		<b>387</b>	<b>197</b>	<b>584</b>

<sup>1</sup> This represents the number of people who signed in at the welcome table but did not speak. This number may be underestimated because not everybody signed in.

<sup>2</sup> The number of speakers was collected only for meetings where a court reporter transcribed proceedings (i.e., Public Hearings).

<sup>3</sup> These dates represent rescheduled dates.

In Arctic Village, Fort Yukon, Kaktovik, and Venetie, posters were set up and Service employees were available to answer questions informally before the public was given the opportunity to provide recorded testimony. A translator was available in Arctic Village, Fort Yukon, Kaktovik, and Venetie.

We documented 584 attendees at our meetings, 197 of which provided oral comments. An additional 196 communications were received in the form of letters, documents, handwritten materials, staff notes, and flip chart notes. A total of 393 communications of all types were received through community meetings and public hearings.

**2.2.3 Communications by Affiliation**

Table 2 presents a breakdown of the affiliation of communications received (where the commenter stated an affiliation).

**2.2.4 Place of Origin of Commenter**

Arctic Refuge is recognized as a place of regional, national, and international significance, and this was reflected in both the overall number of communications we received and the geographic origin of the communications. We received approximately 3,300 communications from Alaska. The greatest number of Alaskan communications originated in Anchorage, followed closely by Fairbanks. The greatest number of non-Alaskan communications originated in California. We received a total of 270 communications from communities near the Refuge (Arctic Village, Fort Yukon, Kaktovik, and Venetie; Table 3).

Table 2. Affiliation of Communications Received on Draft EIS

Affiliation Type	Number of Communications Received <sup>1</sup>
<b>Organizations<sup>2</sup></b>	610,400
<b>Businesses</b>	207
<b>Tribal Governments and Tribal Organizations</b>	14
<b>State Agencies and Representatives</b>	11
<b>Federal Agencies, Entities, and Representatives</b>	6
<b>Alaska Native Corporations</b>	4

<sup>1</sup> Numbers are approximate as based on affiliations declared by commenter. Note that affiliations were difficult to determine from public hearing transcripts.

<sup>2</sup> Includes form letters. The remainder of communications were received from individuals with no affiliation (i.e., no form letter could be assigned to the communication and the author provided no affiliation).

We received a number of form letters with addresses that were not complete or were incorrect in some way. For example, many had United States (U.S.) states listed when the address was for a non-U.S. country. Common examples of this include AR (Argentina), DE (Germany), WA (Western Australia), NE (Netherlands), and IL (Israel). Some had the U.S. listed as the country

when the city and postal code matched that of a non-U.S. country. Some had U.S. states and zip codes listed with no country assigned, while others had non-U.S. cities and postal codes with no country assigned. The contractor used the data provided in the form letters and researched the states, postal/zip codes, and countries in an effort to provide more accurate statistics on the place of origin of the commenter (Tables 3, 4, and 5). Where no state or country could be determined, no value was assigned. For non-form letters, place of origin was based on the city, state, and/or country provided by the commenter, and therefore some of these communications have limited or no place of origin information available. As a result, the statistics are approximate and totals are undestimated to a varying degree. For example, adding up totals of Table 3 and Table 4 results in a lower value than the total of communications from the United States provided in Table 5.

Table 3. Origin of Alaskan Communications, August 15 - November 15, 2011

Community	Number of Communications <sup>1</sup>
Anchorage	858
Fairbanks	840
Juneau	145
Homer	136
Kaktovik	89
North Pole	87
Fort Yukon	86
Sitka	84
Ketchikan	74
Palmer	73
Arctic Village	66
Eagle River	62
Wasilla	58
Unknown	54
Chugiak	32
Seward	32
Soldotna	31
Kenai	29
Venetie	29
Kodiak	24
Talkeetna	21
Denali National Park	20
Ester	20
Haines	16
Girdwood	15
Valdez	13
Williow	13
Douglas	12
Adak	11
Petersburgh	11
Auke Bay	10
Dillingham	10
Elim	10
Skagway	10

Community	Number of Communications <sup>1</sup>
Delta Junction	9
Elmendorf AFB	9
Anchor Point	8
Barrow	7
Copper Center	7
Fort Wainwright	7
Healy	7
Klawock	7
Sterling	7
Thorne Bay	7
Gustavus	6
Clarks Point	5
Cordova	5
Craig	5
Kasaan	5
Kasilof	5
Kotzebue	5
Point Baker	5
Big Lake	4
Dutch Harbor	4
Naknek	4
Nome	4
Seldovia	4
Tenakee Springs	4
Togiak	4
Two Rivers	4
Ward Cove	4
Chickaloon	3
Glennallen	3
Kake	3
Nenana	3
Salcha	3
Shaktoolik	3
Sutton	3

Community	Number of Communications <sup>1</sup>
Tanana	3
Tok	3
Wiseman	3
Circle	2
Clam Gulch	2
Fritz Creek	2
Manley Hot Springs	2
Ninilchik	2
Nulato	2
Port Alexander	2
Saint George	2
Wrangell	2
Akutan	1
Anderson	1
Beaver	1
Eagle	1
Fort Greely	1
Fort Richardson	1
Gakona	1
Halibut Cove	1
Hooper Bay	1

Community	Number of Communications <sup>1</sup>
Hope	1
Indian	1
Kaltag	1
King Salmon	1
Koyukuk	1
Larsen Bay	1
Meyers Chuck	1
Nikiski	1
Nunapitchuk	1
Pelican	1
Point Hope	1
Stevens Village	1
Trapper Creek	1
<b>Total</b>	<b>3,303<sup>1</sup></b>

<sup>1</sup> Not all commenters provided information about the community in which they reside. Therefore, “Number of Communications” is approximate and may underestimate the total number originating from individual communities.

Table 4. Origin of U.S. State and U.S. Territory Communications (excluding Alaska), August 15 – November 15, 2011

State	Number of Communications <sup>1</sup>
AE (military)	10
AL	1,886
AP (military)	1
AR	1,603
AZ	10,052
CA	95,577
CO	15,091
CT	6,417
DC	1,314
DE	1,238
FL	24,889
GA	5,957
GU	37
HI	2,595
IA	2,763
ID	1,655
IL	18,669
IN	5,567
KS	2,437
KY	2,798
LA	1,937
MA	13,981
MD	8,233
ME	3,093
MI	10,838
MN	8,474
MO	5,799
MS	839
MT	1,775
NC	9,886
ND	371

State	Number of Communications <sup>1</sup>
NH	2,949
NE	1,444
NJ	13,753
NM	6,431
NV	2,796
NY	37,282
OH	11,184
OK	1,707
OR	13,545
PA	18,193
PR	596
RI	1,578
SC	2,775
SD	618
TN	4,715
TX	18,635
UT	2,724
VA	9,606
VI	148
VT	2,417
WA	18,010
WI	8,249
WV	1,312
WY	660
<b>Total</b>	<b>449,597<sup>1</sup></b>

<sup>1</sup> Not all commenters provided information about the state or territory in which they reside. Therefore, “Number of Communications” is approximate and may underestimate the total number originating from individual states and territories.

Table 5. Origin of International Communications (including U.S.), August 15 – November 15, 2011

Country	Communication Count <sup>1</sup>
U.S.	532,685
Canada	2,472
United Kingdom	2,043
Germany	1,447
France	1,154
Italy	1,023
Australia	906
Spain	726
Belgium	456
Mexico	455
South Africa	408
Brazil	368
Netherlands	352
Portugal	314
Sweden	287
Greece	253
Poland	213
New Zealand	204
Switzerland	203
Denmark	178
Austria	176
Argentina	170
Finland	149
Croatia	136
Ireland	136
Colombia	123
India	123
Romania	118
Russia	92
Israel	91
Serbia	89
Bulgaria	85
Czech Republic	80
Turkey	78
Malaysia	72
Singapore	68
Norway	60
Philippines	53
Chile	48
Hungary	48
Japan	45
Ukraine	44
Peru	42
China	38
Indonesia	33
Costa Rica	32
Malta	32

Country	Communication Count <sup>1</sup>
Slovenia	30
Estonia	26
Nicaragua	23
Thailand	22
Slovakia	21
Uruguay	21
Venezuela	21
Honduras	20
Hong Kong	19
Pakistan	19
Guatemala	18
United Arab Emirates	18
Bangladesh	17
Cyprus	17
Ecuador	17
Kenya	17
Luxembourg	14
Latvia	13
Lithuania	12
Afghanistan	11
Iran	11
Macedonia	11
Panama	10
South Korea	10
Dominican Republic	9
Iceland	9
Taiwan	9
Egypt	8
El Salvador	8
Paraguay	8
Puerto Rico	7
Lebanon	6
Mauritius	6
Morocco	6
Namibia	6
Nepal	6
Bosnia	5
Macau	5
Trinidad and Tobago	5
Vietnam	5
Yemen	5
Bermuda	4
Cayman Islands	4
Jamaica	4
Maldives	4
Moldova	4
Montenegro	4

Country	Communication Count <sup>1</sup>
Azerbaijan	3
Belarus	3
Bolivia	3
Botswana	3
Ethiopia	3
Gibraltar	3
Saudi Arabia	3
Antilles	2
Cuba	2
Curacao	2
Iraq	2
Kazakhstan	2
Korea	2
Kuwait	2
Nigeria	2
Seychelles	2
Sri Lanka	2
Swaziland	2
Tasmania	2
Zimbabwe	2
Armenia	1
Azores	1
Bahamas	1
Bali	1
Berlin	1
Bhutan	1

Country	Communication Count <sup>1</sup>
Brunei	1
Canary Islands	1
Cook Islands	1
Federated States of Micronesia	1
Fiji	1
Georgia	1
Ghana	1
Grenada	1
Jordan	1
Monaco	1
Mozambique	1
Oman	1
Republic of Trinidad and Tobago	1
St. Lucia	1
Syria	1
Tunisia	1
Tuvalu	1
Uganda	1
<b>Total</b>	<b>549,041<sup>1</sup></b>

<sup>1</sup> Not all commenters provided information about the country in which they reside. Therefore, “Number of Communications” is approximate and may underestimate the total number originating from individual countries.

## 2.3 Information Collected for All Communications

Certain information was collected for every communication (see section 2.1). For those communications stating a preference for one of the proposed alternatives, Alternatives A, C, and E were mentioned most frequently. Some commenters did not provide clear support for a specific alternative. Others explicitly stated they disliked all the alternatives and/or suggested a new alternative. Still others asked that we combine pieces of different alternatives.

Many respondents, but not all, expressed their opinions about increasing the amount of Wilderness in the Refuge or how they perceived oil and gas development. Overall, support for Wilderness or oil and gas development was mutually exclusive.

A total of 935 communications included information about personal use of the Refuge (Table 6). Only those respondents that clearly stated that they had used the Refuge were included in this count. The count does not reflect actual Refuge use, past or present.

Table 6. Commenter Identified Refuge Use

Description of Use	Number <sup>1</sup>
Subsistence	41
Hunting/Fishing	10
Other Recreational Use	375
Commercial Guide	27
Use type not identified <sup>2</sup>	481

<sup>1</sup>Includes only those commenters that clearly stated they had used the Refuge and does not reflect actual Refuge use.

<sup>2</sup>Communications where the commenter mentioned having been on the Refuge, but did not provide any information about the activity that they were undertaking.

## 2.4 Form Letters & Comments Not Requiring a Response (Non-substantive)

### 2.4.1 Form Letters

Over 99 percent of the communications received were form letters. Twenty known organizations submitted form letters, with several submitting variations or slightly different text depending upon the method of submittal (for example, Sierra Club submitted hard copy petitions as well as electronic form letters with different text). One form letter petition was submitted from an unknown source, but the content was affiliated with the Gwich'in Nation. Five other unknown organizations submitted form letters as well. In total, 39 unique form letters were received. A copy of each form letter can be found in Appendix A.

Three of the form letter campaigns (representing two organizations) were in support of oil and gas development and were concerned with the potential for increasing economic opportunity by developing the 1002 Area. The remaining 36 form letters supported increasing the amount of designated Wilderness in the Refuge and/or stated opposition to oil and gas development in Arctic Refuge.

#### **2.4.2. Comments Not Requiring a Response**

Non-form letters mirrored very similar concerns as the form letters. Below are examples of comments from communications other than form letters that do not require a Service response. These examples address Wilderness and oil and gas concerns:

##### **Wilderness Designation/Character:**

*“I support protection of the Arctic Refuge’s Special Values—from the wilderness character of the whole refuge, to ecological protection at the landscape scale, wildlife habitats, rivers, Alaska Native culture and subsistence, and recreation.”*

*“In general I support Alternative E. Wilderness is one of the main objectives in the establishment of the Arctic National Wildlife Refuge. This is our wildest of all refuges in the US. For this reason I support wilderness recommendation for the vast majority of lands within the Brooks Range unit, the Coastal Plain and the Porcupine Plateau.”*

##### **Oil and Gas Development:**

*“When development proponents say the footprint (few roads, installations to be constructed and serviced by air) would be small during exploration is at best a gross deception because nothing is said to the post exploratory scenario, that is, once oil is discovered and what would a mushrooming infrastructure may entail such as mining gravel for things as road, drilling pad, building and pipeline construction as part of a complex delivery system.”*

*“Big Oil has already destroyed hundreds of wildlife in last year’s Gulf Disaster, and they are on an unconscionable mission to continue their greedy and careless plan to drill wherever they can on our planet. Please stop this destructive corporate giant from destroying our animals, and our oceans. Please sign into law this Conservation Plan for the Arctic National Wildlife Refuge.”*

*“Two of your identified alternatives could permanently close the 1002 area of the Coastal Plain to oil and gas development. With an estimated 16 million barrels of oil and 18 trillion cubic feet of natural gas, these alternatives would severely jeopardize our country’s energy security.”*

*“The ANWR 1002 area should continue to be excluded from wilderness designation because its potential for augmenting Alaska’s and the United States’ hydrocarbon resources should not be sacrificed to add to the enormous wilderness area already designated on the North Slope.”*

Comments not requiring a response from the villages of Arctic Village, Fort Yukon, Kaktovik, and Venetie focused on concerns related to the residents’ deep connection to the land and the resources of the area. Some comments focused on topics that will be addressed in future step-down plans, such as concerns about visitor behaviors. These comments will be reviewed again when the step-down plans are written. Below are examples of such comments from these villages:

*“ I have been fortunate to grow up with intelligent educators, role models and, essentially, this community. I would have to say the most important education I have received is in attending and -- or listening to meetings and hearings both local and afar. Ever since I was an infant, I have been living off of this land and so have most everyone here, all at a cost of driftwood, wild animals, plants and water or ice. We believe this was given to us through our Creator. We have always given back to the land, animals and plants as much as we have taken. We have always been great stewards of these lands between what you know as Kaktovik and our special -- specifically-chosen private lands, lands we need in order for our future generations to strive in this world.”“This land belongs to the people who live here.”*

*“I wanted to say the Gwich'in people have -- since the beginning, have fought for the land. The battle has always been in our back yard. The people that live here will always rely on our culture and it's our subsistence that feeds our childrens. We want this area to be closed to oil development.”*

*“We know where we go fishing, hunt, travel, we did this forever, leave everything alone. We need help to keep the land the way it is and preserve it.”*

*“I'd highly recommend you guys for Alternative E to protect the Arctic Refuge because the Refuge means a lot. It's rich in land and it provides for the many species of animals, including the Porcupine Caribou Herd and to thousands of birds where they migrate from all over the world. If it opens, where it's nice and green, if a disaster happens, it won't be green anymore. It will turn black and polluted. Birds and the caribou won't know where to go. Highly, strongly keep it protected.”*

*“if they open that up for drilling and, you know, what about our future for our kids? I mean, there's a lot of areas that are used for hunting. There are some sacred grounds and stuff like that and if they went through all that and it just destroy our hunting areas. I mean, there's a lot of things that will be destroyed...”*

*“ These lands in the coastal plain are not wilderness and does not qualify this designation because our ancestors lived on these lands, hunted on these lands, fished on these lands and fought battles to keep the lands to protect them for our future use and for their descendants. There are many graves in our traditional lands and more are being found and some are eroding on the coast and have to be re-buried. So the idea of trying to make the 1002 area into a wilderness designation is another slap in our faces because we live here, our ancestors died here and this is not a place without people.”*