



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL] Attn: Coastal Plain Oil and Gas Leasing Program2 messages

Faith Gemmill <redoilone@gmail.com>
To: blm_ak_coastalplain_EIS@blm.gov

Tue, Jun 19, 2018 at 9:15 PM

June 19, 2018

Submitted via email

Attn: Coastal Plain Oil and Gas Leasing Program

Email: blm_ak_coastalplain_EIS@blm.gov

Re: Notice of Intent to Prepare an Environmental Impact Statement for the Coastal Plain Oil and Gas Leasing Program

To Whom It May Concern:

REDOIL is an Alaska Native Network of the Inupiat, Yupik, Aleut, Tlingit, Eyak, Gwich'in and Denaiana Athabascan Tribes. REDOIL is a movement of Alaska Natives who are challenging the fossil fuel and mining industry and demanding our rights to a safe and healthy environment conducive to subsistence. We aim to address the human and ecological health impacts brought on by unsustainable development practices of the fossil fuel and mining industry, and the ensuing effect of catastrophic climate change. We strongly support the self-determination right of Tribes in Alaska, as well as a just transition from fossil fuel and mining development to sustainable economies, and sustainable development.

We submit the following comments in response to the public notice from April 20, 2018, Notice of Intent to Prepare an Environmental Impact Statement for the Coastal Plain Oil and Gas Leasing Program, Alaska, 83 Fed. Reg. 17562 (Apr. 20, 2018).

We oppose all oil and gas activities on the Coastal Plain of the Arctic National Wildlife Refuge. We stand with the Gwich'in Nation and support their efforts to protect their human rights and food security by protecting the Coastal Plain.

Despite decades of support for protecting the Arctic Refuge's Coastal Plain from oil and gas, Congress included a provision in the Tax Cuts and Jobs Act (Tax Act) to open the Coastal Plain to oil and gas development. This law was adopted through the budget reconciliation process under restrictive Senate procedures that only required a simple majority vote. Senator Murkowski was clear that she only used this legislative vehicle because there was not the support necessary to open the Refuge through the normal legislative process

Some of our concerns in this process are as follows:

The EIS Process must be given an appropriate amount of time and study. During the past few weeks, DOI has made statements indicating that it will proceed with an aggressive plan for implementing an oil and gas program on the Coastal Plain of the Arctic National Wildlife Refuge. The timeline for holding a lease sale given by both agency officials and Alaska's congressional delegation is very fast. The stated goal is to hold a lease sale by the summer of 2019.

A one-year timeline will not be sufficient time for consultation with affected tribal entities or to solicit input from remote communities that will be affected, or from the nation's public. Further, BLM will not have adequate time to do new studies to fill gaps or even fully consider existing data. This overly strict timeline limits the chance for multiple-year surveys that are needed to understand impacts to wildlife populations and habitat, surface resources, recreational use trends,

economic impacts, adverse health impacts on local communities, and subsistence impacts inherent in this proposed project.

BLM must coordinate and consult with Alaska Native Federally Recognized Tribes. Federal regulations, and BLM policy all require the agency to coordinate planning with affected Indian tribes. FLPMA requires coordinating BLM planning and resource management with tribes and tribal land resource management programs, where appropriate and consistent with federal law.

It is critically important to honor the government-to-government relationship with all tribal entities that may be affected by leasing on the Coastal Plain, meaning all tribes that rely upon the Coastal Plain's resources for subsistence.

The BLM must adhere to these mandates to coordinate with and consult with tribes. BLM must take a broad and inclusive approach in doing so. Many tribes and Alaska Natives could be affected by an oil and gas program on the Coastal Plain, even if the tribe or tribal members are geographically distant from the Coastal Plain.

The Gwich'in people live in fifteen communities located along the migratory path of the Porcupine Caribou Herd across a vast area extending from northeast Alaska to the northern Yukon and Northwest Territories in Canada. It is unclear which communities have been contacted by BLM for consultation. All Gwich'in communities should be included in consultation in this process. Likewise, DOI should contact and hold hearings for scoping and on the Draft EIS in all villages that desire a hearing.

We oppose any attempts to allow oil and gas activities on the Coastal Plain, Department of the Interior (DOI) officials have stated that they will move the environmental review process forward at a very fast pace and have outlined a timeline to complete the NEPA review and hold a lease sale by next summer. A rushed process is not consistent with DOI's legal obligations when considering an issue as important and controversial as destructive oil and gas exploration and development on the Coastal Plain. Reckless decision-making is not what the Arctic Refuge deserves. Instead of rushing to lease the Coastal Plain, DOI should listen to the millions of Americans and the Gwich'in Nation who support protection for the Coastal Plain and refrain from holding a hasty, ill-considered lease sale. Simply put, the Coastal Plain is no place for any oil and gas activities.

Furthermore, we write our comments in support of the Native Village of Venetie Tribal Government and Gwich'in Nation comments on this matter, which include but are not limited to:

Protecting the original purposes of the Arctic Refuge, including subsistence:

The new oil and gas purpose of the Arctic Refuge appears in conflict with the other purposes of the refuge. We are concerned that oil and gas development will degrade subsistence resources and access to these resources, including wildlife, plants, water, and air quality, among others. BLM needs to:

- Address competing mandates of these purposes and assess how the agency will manage and prioritize these purposes and fully analyze how this new oil and gas purpose may impact subsistence resources and access to them, and how BLM intends to minimize these impacts

ANILCA 810 Analysis

- Consult with tribes to complete an ANILCA 810 analysis and address subsistence impacts for all of the communities that rely on the resources of the coastal plain, not just those communities on the coastal plain

There are many potential harmful impacts to the land, water, and subsistence way of life. BLM needs to assess how oil and gas leasing and development will affect:

- Social and cultural resources for Alaska Natives, including Gwich'in
- Archaeological resources
- Environmental justice

We also strongly request that a **No Action** Alternative is included in the EIS.

Sincerely,

Faith Gemmill, Executive Director

Faith Gemmill <redoilone@gmail.com>
To: blm_ak_coastalplain_EIS@blm.gov

Tue, Jun 19, 2018 at 9:50 PM

To Whom It May Concern;

Resisting Environmental Destruction on Indigenous Lands (REDOIL) would like to join the letter submitted by Trustees for Alaska and signed by 24 groups earlier today.

Thank You,

Faith Gemmill, Executive Director
Resisting Environmental Destruction on Indigenous Lands (REDOIL)