



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

Fwd: [EXTERNAL] Extension Request

1 message

Hayes, Miriam (Nicole) <mnhayes@blm.gov>

Fri, May 11, 2018 at 1:50 PM

To: BLM_AK CoastalPlain_EIS <blm_ak_coastalplain_eis@blm.gov>

Nicole Hayes

Project Coordinator
Bureau of Land Management
222 W. 7th Avenue #13
Anchorage, Alaska 99513
Desk: (907) 271-4354

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From: **Bernadette Demientieff** <bernademientieff76@gmail.com>

Date: Fri, May 11, 2018 at 12:31 PM

Subject: [EXTERNAL] Extension Request

To: mnhayes@blm.gov

Ms. Hayes,

Attached is a request for an extension for the scoping period for the Arctic National Wildlife Refuge Leasing EIS, 83 Fed. Reg. 17562 (Apr. 20, 2018). An extension is necessary so that the Gwich'in Nation can fully and meaningfully engage. We look forward to your prompt response.

Mahsi' choo,

Bernadette Demientieff

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**60 day extention DOI.pdf**

151K

Gwich'in Steering Committee

122 First Avenue ♦ Fairbanks, AK 99701 ♦ 907.458.8264 ♦ fax 907.457.8265



*"In no case may a people be deprived
of their own means of subsistence."
International Covenants on Human Rights*

May 11, 2018

Submitted via email

Nicole Hayes
Project Manager
Attn: Coastal Plain Oil and Gas
Leasing Program EIS
222 West 7th Avenue, Stop #13
Anchorage, Alaska 99513
mnhayes@blm.gov
blm_ak_coastalplain_EIS@blm.gov

Re: Request for extension of scoping public comment period for Arctic National Wildlife Refuge Coastal Plain Oil and Gas Program

Dear Ms. Hayes,

We write to respectfully request an extension of the public comment period for the Bureau of Land Management's (BLM) 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). The public notice stated that the comment period is for 60 days, until June 19th. We request a 62-day extension to submit comments for this important process — until Monday, August 20th. We understand that the Native Village of Venetie Tribal Government will submitted a similar request as well.

The Gwich'in Steering Committee, founded in 1988, is the unified voice of the Gwich'in Nation speaking out to protect our ancestral lands on the Coastal Plain of the Arctic National Wildlife Refuge. We represent fourteen communities in Alaska and Northwestern Canada: Arctic Village, Beaver, Birch Creek, Canyon Village, Chalkyitsik, Circle, Eagle Village, Fort Yukon and Venetie in Alaska, Old Crow, Yukon, and Fort McPherson (Teetl'it Zheh), Tsiigehtchic, Aklavik and Inuvik, Northwest Territories, in Canada. Protecting the Porcupine Caribou Herd is vital to our human rights and our food security. We have worked for decades to protect the Coastal Plain and plan to engage all Gwich'in people in this process to speak out to protect our way of life.

In the Notice of Intent, BLM stated that it "will work collaboratively with interested parties" and will "consider subsistence resources and users." This requires that the BLM ensure adequate time

Arctic Village -Fort Yukon -Venetie - Yukon Flats
– Old Crow– Tsiigehtchic – Fort McPherson

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and opportunity to engage the Gwich'in people.¹ In the press releases issued yesterday announcing the public meetings, the BLM Acting Director stated that the agency has received a lot of interest in this project and that it is important that the agency take its time to understand the issues. A 60-day timeline is simply too short. It is imperative that the BLM ensure that any process to consider leasing on the Coastal Plain allows for robust participation by those that will be most impacted by the decision — Alaska Natives and Canadian First Nations members.² The ability to conduct outreach to our tribal members takes considerable time given the realities of village travel and communications across two nations.

We note that the BLM started this process just four months after the tax bill passed, giving us very little time between the passage of the bill and the start of this process to engage our members and educate them about this process. Additional time is necessary to ensure that we can educate our tribal members. This is the first time that the Coastal Plain could be offered for lease. Making sure that our members understand the legislation that was passed as well as BLM's process for evaluating the impacts and holding a lease sale on the Coastal Plain is vital information to bring to our communities so that our people can meaningfully engage. As part of this process, DOI is obligated to reach out to every tribal council that is part of the Gwich'in Nation for purposes of government-to-government consultation, and to determine if their community wishes to hold a scoping meeting as part of this public process.

Additionally, many of our leaders and elders speak Gwich'in as their first language. Our youth is re-learning the language as well. Our people's ability to understand the process and review the analysis that BLM is undertaking will be limited if the documents are only provided in English. To ensure that the Gwich'in are able to fully and fairly participate in the process, we ask that all documents be translated into Gwich'in and that translators be available to assist with questions and comments at all public events and meetings. We are happy to work with you to identify Gwich'in who can translate materials.

Finally, at multiple events and in the press, U.S. Department of the Interior officials have stated that they want to complete the review process and hold a lease sale within a year. We do not believe that a year is sufficient to understand the impacts to our human rights and culture or to hear from all of the people that will be impacted by this decision. We denounce any process that will cut out Gwich'in participation or marginalize our concerns. BLM must not rush this process.

In sum, we respectfully request that you extend the public-comment period for scoping by an additional 62 days — until August 20th — so there is additional time to engage in this step of the process. We also request that all materials be translated into Gwich'in to ensure that our people can fully participate in this process.

Sincerely,

BDemientieff

¹ 40 C.F.R. §§ 1500.2(d), 1506.6.

² 40 C.F.R. § 1501.7(a).

Bernadette Demientieff
Executive Director

CC:

Karen Mouritsen, Acting State Director, BLM, kmourits@blm.gov

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