



CoastalPlain\_EIS, BLM\_AK &lt;blm\_ak\_coastalplain\_eis@blm.gov&gt;

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**[EXTERNAL] comment on Arctic Refuge oil development**2 messages

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**Gary Kofinas** <gary.kofinas@alaska.edu>  
To: blm\_ak\_coastalplain\_EIS@blm.gov

Tue, Jun 19, 2018 at 5:12 PM

Gary Kofinas, PhD

Principal Research Scientist / Professor Emeritus

Institute of Arctic Biology

University of Alaska Fairbanks

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**Kofinas to BLM - Comments on Scoping for Arctic Refuge 1002 development.pdf**  
298K

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**Gary Kofinas** <gary.kofinas@alaska.edu>  
To: blm\_ak\_coastalplain\_EIS@blm.gov

Tue, Jun 19, 2018 at 5:22 PM

Errata! – Minutes ago I inadvertently send you an incorrect edition of my letter. PLEASE use this one. Thank you, Gary Kofinas

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**From:** Gary Kofinas <gary.kofinas@alaska.edu>  
**Sent:** Tuesday, June 19, 2018 6:12 PM  
**To:** 'blm\_ak\_coastalplain\_EIS@blm.gov' <blm\_ak\_coastalplain\_EIS@blm.gov>  
**Subject:** comment on Arctic Refuge oil development

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**Kofinas to BLM - Comments on Scoping for Arctic Refuge 1002 development 2.0.pdf**  
296K

**Regarding: Comments for Scoping development of the Arctic Wildlife Refuge AREA 1002 for oil and gas.**

**To: BLM/ DOI, Alaska**

**From: Gary Kofinas, PhD, Professor Emeritus, University of Alaska Fairbanks**

**Date: June 19, 2018**

I submit my comments for the scoping process with a long history working in and studying the region of northeastern Alaska and northwestern Canada. From 1988 to 1992 I taught summer courses for UAF in Arctic Refuge, asking students if the area should be open for oil development. Starting in the mid-1990s I was funded by the US State Department Man and the Biosphere program and the National Science Foundation (NSF) to do my PhD research on co-management of the Porcupine Caribou herd (PCH). I went on to be a researcher with the NSF Sustainability of Arctic Communities project that assessed how various forces of change, including oil development, would affect the region's indigenous PCH user communities. I later helped to found the Arctic Borderlands Ecological Knowledge Coop, a community-based monitoring program focused on the PCH region; and am a co-founder of Circumpolar Rangifer Monitoring and Assessing Network (CARMA). I was also the PI of another NSF project that studied the heterogeneity and resilience of Human-Caribou Systems of the Arctic, and PI of a BOEM funded study that documented subsistence sharing in several AK communities, including Kaktovik and Venetie. I continue to work with communities, agencies, and scientists of the region.

In this letter I focus on four points related to the *process* of scoping and assessing:

1. Assessing Oil and Gas development impacts in haste: Research and experience show that assessments of proposed resource development completed hastily can result in incomplete and at times inaccurate information. Haste can also erode public support of final decisions and the institutions of assessment. The current push by the administration to complete seismic studies and ecological and social assessments during its brief window of political opportunity represents neglect on its part to meet the full requirements of NEPA and to honor the Public Trust Doctrine. The last EIS for proposed development of the 1002 lands was completed in 1987, and was fraught with political manipulation in an effort to achieve a desired outcome. That Legislative EIS was preceded by five full years of intensive baseline studies. Much has changed in the ensuing 30 years, and the expectation that a comprehensive assessment of impacts is feasible quickly is both a hazard and unrealistic. The Arctic Refuge development decision, which has been the subject of public debate for decades, merits thorough analysis and time for careful consideration by the public and policy makers.
2. Meeting our international responsibility: The Porcupine caribou herd (PCH) is an internationally migratory species harvested by residents of Alaska, Yukon Territory, and Northwest Territories. The vast majority of PCH animals harvested each year are by

residents of Canada, most of whom live in the First Nations communities of Old Crow, Fort McPherson, Aklavik, Inuvik, and Dawson. In Alaska, Kaktovik and Arctic village are the two primary communities harvesting PCH, but meat from the PCH makes its way to households across the region and the state through subsistence sharing. Our 2015 BOEM research found that in Kaktovik, considered by many a whaling community, more than a third of its harvested wildfoods (~72,000 lbs / year) are caribou.

In 1987, the US recognized the great importance of this transboundary resource by signing the US-Canada International Agreement for the Conservation of Porcupine Caribou. That agreement formalized both countries' commitment to ensuring the future conservation of the herd and its habitat. It also set high standards for research and monitoring of the herd, and noted the importance of the herd to communities that depend on it. The agreement also called for the formation of the International Porcupine Caribou Board, with members to be appointed by each federal government. Board's members from each country were directed to meet regularly to discuss conservation issues related to the PCH and make recommendations to their respective governments. Since its formation, however, the board has been mostly inactive. The board's inactivity in all cases has been the result of the US Federal government refusing to select US board members and thus, making the agreement and its implementing body ineffective. The current administration has repeated that pattern by refusing to select members, and as a consequence, it is not meeting its bi-lateral obligation. With the assessment of oil and gas development now underway, deliberations of the International PCH Board would be helpful to insure that all factors are being considered with the best possible information available.

3. Cultural identity and uncertainty in caribou science: Of the five primary communities across the range of the herd that harvest PCH, four have strong cultural ties to caribou, with many individuals in those communities considering themselves "caribou people." These people's identity with caribou cannot be understated. Creation stories, oral histories, and legends of surviving the harsh conditions of the arctic are commonly framed around the relationship between people and caribou and the need of people to respect caribou. For this reason, threats to the PCH will have negative impacts on people who continue to cope with the lasting effects transgenerational of colonialization.

But will oil development negatively impact caribou? As caribou science is assembled and reviewed for assessment, it is important to note there is and always has been enormous uncertainty regarding the determinants of caribou herd population size and herd annual distribution and movements. Current observations of climate and related bio-physical systems show that dramatic changes are without question occurring across the Arctic. At present almost all herds in the Circumpolar North are in decline, some dramatically. The PCH is an anomaly among these herds with the last census showing an increase.

Will the PCH track with other herds of the Arctic? We do know the Porcupine herd has historically calved in 1002 Area, and early studies show a positive relationship between herd reproductive success and calving in AREA 1002. As well, studies in the Prudhoe oil fields show that caribou were displaced by infrastructure during calving from traditional calving areas. Studies also show that future conditions are likely to bring an increase of ice and snow events to the Arctic Access to Alaska's North Slope (AREA 1002), a shock that has resulted in severe die-offs of *Rangifer* in other areas. The question of proposed development must be considered in light of the uncertainty in caribou science, the potential impacts of changing arctic landscape on caribou, and the deep cultural relationship in and nutritional dependence of indigenous peoples on PCH. Social and environmental justice must be considered carefully by policy makers and the public.

4. The impacts of development as evidenced in other areas: Evidence from other areas of the Arctic show how the impacts of oil and gas development within a region can have significant impacts on communities. While development can result in a huge infusion of money to some village households, others may be left with little. More significant is how development, especially when it occurs quickly, can radically change the social cohesion and fabric of a community, as well as residents' sense of well-being and health. In some cases these impacts are difficult to quantify, but still, an assessment of social impacts must fully account for these likely consequences.

Above I noted my concerns regarding the effort to rapidly meet NEPA requirement; the USA's neglect in meeting its international commitment to conserve PCH; the close relationship of indigenous people and caribou in the PCH region and the many uncertainties of caribou science; and the need to assess fully how social impacts affect all communities if development occurs.

I respectfully submit these comments with the request that they be noted and considered.



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