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**[EXTERNAL] Comment on the EIS Coastal Plain Oil and Gas Leasing Programs**

1 message

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To: mnhayes@blm.gov, blm\_ak\_coastalplain\_EIS@blm.gov

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Dear Ms Hayes,

The Bureau of Land Management of the state Alaska is planning to conduct a Leasing Environmental Impact Statement (Leasing EIS) for the purpose of implementing an oil and gas leasing program in the northern part of the Arctic National Wildlife Refuge named "Coastal Plain". This is part of the United States Tax Cuts and Jobs Act of December 2017, Title II, Section 20001, Oil and Gas Program according to which at least two oil and gas leases have to be put on sale until December 2024.

This includes the issue of post-lease activities like seismic and drilling exploration as well as the development and transportation of oil and gas within and to destinations outside the Coastal Plain.

As a German and global citizen I am deeply concerned about the prospect of opening the "Area 1002" to oil and gas development.

This area has a vital meaning and importance for the indigenous people living on the surrounding lands of US and Canadian territory, the Gwich'in. As a global citizen I see it as my duty to stand up for endangered indigenous tribes in general and the Gwich'in of the United States and Canada in particular. The United Nations Declaration on the Rights of Indigenous Peoples, voted for by a vast majority of 143 countries all over the world and accepted by the UN General Assembly in September 2007 stresses that indigenous peoples "contribute to the diversity and richness of civilizations and cultures, which constitute the common heritage of humankind" (1). This opinion is stated more detailed in the Indigenous and Tribal Peoples Convention 1989 (No. 169) of the International Labour Organization (ILO), which "(calls) attention to the distinctive contributions of indigenous and tribal peoples to the cultural diversity and social and ecological harmony of humankind and to international co-operation and understanding" (2).

By opening the Coastal Plain for oil and gas exploitation the Gwich'in culture and people will be under threat as they have never been before. Drilling in this fragile ecosystem will endanger the Porcupine Caribou herd for which, among a huge range of other animals, this is an important, unique, and irreplaceable habitat.

The spiritual and physical connection of the Gwich'in people to the Porcupine Caribou has been existing for millennia. They depend on the herd for food, clothing and craft. Also, "vadzaih (caribou) is intrinsic to our souls, our spirit, our every existence as Gwich'in, without caribou our fundamental way of life will begin to unravel." "The caribou is a symbol for our people to keep on teaching the traditional skills to the young generations so that they never forget where they come from and where they are going. The caribou is our strong foundation" (3). So, a threat to the herd means a threat to the people.

The Porcupine caribou herd which comprises between 150,000 and 200,000 animals repeatedly spends late May and early June in the coastal plains of the 1002 Area for calving. In these weeks the prairies are snow-free, offer plenty of vegetation which is good for camouflage and decreases predation, which makes them an essential, nutrient-rich area for a large number of parturient female caribou. Since this area is so critical for calving, disturbances caused by drilling would decrease the number of animals and force the remaining animals to seek refuge in less suitable areas. Studies have found that drilling in the ANWR will displace the herd by 30 miles and reduce calf survival by 8.2%. This will not be enough to ensure the size of the herd (studies say, 4.6% reduction in calf survival is the critical threshold), as the number of dying animals will not be compensated by new-born ones (4). Proof of this is provided by some rare experiences in the past, when the Porcupine herd was unable to reach the 1002 Area because of too much snow: The calf survival dropped by 19% (5). In case of drilling this will not be a rare circumstance but an ongoing condition which will have devastating effect on the herd.

A displacement southwards will have severe impacts for the Porcupine herd for other reasons as well. Alternative areas are less nutrient-rich and will endanger the herd by increased predation from grizzly bears and wolves that exist there in greater density than in the Coastal Plain (6). Furthermore, the caribous move towards the coast for relief from harassment by mosquitoes. Drilling will hinder the access to this area and cause more disease or death by higher insect density. The proposed main pipeline for the 1002 Area will cut through the calving grounds. While supporters of drilling argue the infrastructure and pipelines will not influence the caribou's behavior much, the opposite has been observed. There is evidence that caribou herds do not travel under pipelines but rather stay as far as 20 miles away from them (7). Accordingly, the pipeline will reduce the insect relief area usable for the herd by about 52% which is a serious threat to the herd's thriving.

As stated by a Gwich'in on the website [alaskapublic.org](http://alaskapublic.org) in May 2018: "If there is development in this area and when we do lose the caribou, that will be a significant channel of life that will have dried up and shut down forever" (8).

In addition to the danger of the drilling infrastructure for the Porcupine caribou herd, research found that the chances of oil spills are extremely high. Leaks occur on a regular basis. On offshore drilling alone, each year 880,000 gallons of oil are left in ocean waters by US drilling operations. The leak in the Trans-Alaska Pipeline System where 267,000 gallons of crude oil were spilled undetected for several days (9) shows that statements about the safety of infrastructure and monitoring systems are not as reliable as advocates of drilling claim. Oil spills do happen and have severe consequences for the environment, and cleaning oil from ice as well as cleaning contaminated land and sea in Arctic conditions (i. e. cold, darkness and remoteness) is extremely hard or even impossible. Furthermore, the drilling process itself produces so-called drilling muds. These muds contaminated with toxins like benzene, zinc, arsenic and radioactive materials stay in the surrounding land on a long-term basis.

As stated on the website of the Bureau of Land Management, the mission of the agency "is to sustain the health, diversity, and productivity of America's public lands for the use and enjoyment of present and future generations" (10). As showed above, the opening of the ANWR for drilling clearly contradicts this goal. Moreover, it contradicts the goal of the international community "to respect and promote the inherent rights of indigenous peoples ... especially their rights to their lands, territories and resources" "that they possess by reason of traditional ownership or other traditional occupation or use", as well as "to give legal recognition and protection to these lands, territories and resources" and to "take effective measures to ensure that no storage or disposal of hazardous materials shall take place in the lands or territories of indigenous peoples without their free, prior and informed consent" (11). These rights have been set out as well in the ILO Convention No. 169 concerning Indigenous and Tribal Peoples, the Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security, and other international and regional instruments (12).

In the Porcupine Caribou Agreement of July 1987 the United States and Canada commit to protect the Porcupine caribou herd, its routes and calving grounds, and warrant the Gwich'in participation in all processes concerning this matter (13). The agreement acknowledges explicitly this herd's profound importance for the existence of the Gwich'in's traditional way of life and obliges the two countries to avoid anything that could threaten the herd or the Gwich'in. Opening the ANWR for drilling without the free, prior and informed consent (FPIC) of the Gwich'in would violate this treaty for the reasons demonstrated above.

In fact, the objective of sustainable treatment of US public lands that is stated by the BLM would be supported by acknowledging the importance of indigenous peoples and by respecting their traditional lands. Scientific studies prove their extraordinary ability to sustainably manage lands. The World Resources Institute calls them "some of the best environmental stewards": Tenure-secure indigenous lands have lower deforestation rates than other areas; also indigenous and community lands store about 25% of the world's aboveground carbon, making these lands critically important in the global fight to curb climate change (14). The UN "recognizes that respect for indigenous knowledge, cultures and traditional practices contributes to sustainable and equitable development and proper management of the environment" (15). Since the Earth Summit (Conference on Environment and Development, UNCED) in Rio de Janeiro 1992, the sustainable development as leading principle is internationally accepted. Protecting the Arctic as one of our last and greatest unspoiled wild places and a fragile and remote ecosystem is an imperative not only for the United States but for the international community and every global citizen.

Let me add a personal note. I spent 8 months in Old Crow, a Gwich'in village in Northern Canada with no road access. In Germany we don't have untouched wild places anymore or just very tiny areas, and we don't have native communities. My experience is that to live with a native people who still lives of hunting, gathering, and uses traditional rituals and celebrations there is a unique way of teaching the spiritual and physical connection between humans and nature, the importance of that connection, a responsible way of living in harmony with plants, animals, and nature in general that cannot be taught by anyone else and in no other place than in an untouched natural environment. This level of combined understanding—physically, sensually, spiritually, and intellectually—is only possible there. This knowledge and wisdom bridging the time span of thousands of years of human experience of life that is largely forgotten in so-called civilized societies is precious and of inestimable value and is required globally for our all future thriving.

The traditional Gwich'in knowledge for example to communicate with nature or animals, especially caribou, in dreams is not fiction, I experienced it myself. The internationally well-known and highly respected scientist and founder of the modern psychology Carl Gustav Jung warned that the "modern cultivated mind (...) shows a shocking degree of dissociation and psychological confusion" and suggests that "in this time fallen ill by general disorientation (...) it is essential to know the true state of the human condition, to know about the human psyche as well as the past and the present and to put everything into perspective", and he suggests analyzing closely the humans' dreams to reach this goal: "At a time where every resource is used to explore the nature, there is not paid much attention to the essence of the human being, to the psyche. (...) Its real unknown part that emerge in the form of symbols is still 'terra inkognita'. And still it sends signals every night (in the form of dreams). (...) The exploration of the individual as well as the collective symbols is a huge task that is not yet solved, but has finally begun. The results so far are encouraging, and they seem to be an answer to many questions of the present-day human race" (16).

In our search for answers on substantial life matters it is vital for the global community to do everything possible to save and protect this knowledge. We have to protect indigenous ways of life where they still exist as a vital source for our human's growth and thriving. Therefore there should not be any industry in the Gwich'in's Izhik Gwats'an Gwandaii Goodlit ("The Sacred Place Where Life Begins") ever.

Thank you for your time and consideration of this extremely important matter,

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