



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL] Public Comment

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To: blm_ak_coastalplain_EIS@blm.gov

At the May 29 scoping meeting in Fairbanks, AK, local UAF anthropology Ph.D. candidate Odin Miller, noted the need for the coastal plain EIS to recognize Alaska Statute 16.05.094. According to this law, the Alaska Fish and Wildlife Division of Subsistence must gather and share information on the details of state residents' subsistence needs. These are to include evaluation of "the impact of state and federal laws and regulations on subsistence hunting and fishing, and when corrective action is indicated, make recommendations to the department." These recommendations may include "amendment and appeal of regulations affecting subsistence hunting and fishing." This seems to resonate, as well, with ANCILA's purposes. According to the 1980 Act, oil and gas activities may proceed only IF they "avoid significant adverse affects on fish and wildlife" and "provide the opportunity for rural residents engaged in a subsistence way of life to continue to do so." Miller also noted that there are no data on the role of subsistence caribou hunting for the Gwich'in People in Alaska's Fish and Wildlife Division of Subsistence files. He recommended a minimum of three years of Porcupine Caribou Herd studies in relation to the needs of all villages dependent upon them.

I would like to add a call to respect the Gwich'in People's knowledge of their own needs and knowledge about the needs of the Porcupine Caribou Herd accumulated across thousands of years of interdependence. They knowingly insist that oil and gas drilling can not co-exist with their subsistence (as well as other spiritual and cultural needs). As Bernadette Demientieff, director of The Gwich'in Steering Committee, stresses, "My elders are my scientists. They have been living in this area a lot longer than any body else. And, when they say this [oil and gas activities] is the wrong thing to do, when they say that our way of life is at risk, I'm gonna take their word before anybody else's. They know our animals."

This scoping process, then, must take into account the purposes, intents, and requirements of Alaskan and Federal laws regarding subsistence as mentioned above. This includes gathering and sharing related data, which has not yet been done. In doing so, however, the Gwich'in People and other Alaska Natives must not be treated merely as subjects of research, but as scientists themselves. The Gwich'in Nation and other Alaska Native Peoples know the Arctic, the coastal plain, the caribou, their own cultures, and their interdependent needs, obviously, far longer and far more intimately than anyone else. Required information on subsistence and coastal plain caribou must be gathered according to principles, for example, as explained in Linda Tuhiwai Smith's work, *Decolonizing Methodologies*.

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