



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

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**[EXTERNAL] Coastal Plain Oil and Gas Leasing Program EIS comment letter**

1 message

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julie@jbr-y.net <julie@jbr-y.net>  
To: blm\_ak\_coastalplain\_EIS@blm.gov

Sat, Jun 16, 2018 at 1:16 AM

To the Bureau of Land Management:

I have spent a lot of time thinking, talking and writing about the Arctic Refuge, including the proposed lease sale area. I am very fortunate to have been to the Coastal Plain of the Refuge, specifically in the 1002 area proposed for oil and gas leasing. I have also written a Master's degree thesis about the Arctic Refuge and the reasons why it is important to, and valued by, so many diverse groups of Americans. Please review this thesis as part of your due diligence research for this EIS. The document is easily accessible through the University of Alaska (Raymond-Yakoubian 2002, "Distance Activism and the Arctic National Wildlife Refuge"), or by request to me.

I am opposed to the proposed leasing.

I personally value the Coastal Plain of the Arctic Refuge as it is and for what it is. It is a wild place that has – mostly – only seen the light touch of humans;  
it is calving grounds for the Porcupine Caribou Herd;  
it is a bird sanctuary and nesting ground;  
it is an idea;  
it is a symbol;  
it is a cultural landscape that provides for indigenous communities;  
it is landscape imbued with spirituality – and it is *many* other things to *many* people.

As part of your process there are many things that you need to fully and meaningfully consider:

- Climate change is a reality and the effects of it can already be felt, and seen, all along the North Slope, Beaufort Sea and all of Arctic Alaska. Our country and our state need to be moving away from fossil fuels – not further entrenching ourselves in our dependence on them. This lease sale would do nothing to get us towards sustainable energy independence.
- I'm assuming, and hoping, that formal Government-to-Government tribal consultation has already begun with *all* potentially impacted Tribes. This work should be prioritized in both your timelines and in your decision-making.
- Related to tribal consultation, but also independent of it – I expect that the *environmental justice* portion of your EIS will be *quite* substantial, and will involve Tribal Governments, as well as a variety of anthropologists, social scientists and others that are experts on these issues.
- There needs to be a substantial and meaningful discussion of the *values* that Americans place on the Refuge and the Coastal Plain in your discussion of the human environment and socio-cultural impacts from proposed leasing.
- The Coastal Plain has numerous documented and undocumented archaeological and historic sites, and impacts to those sites need to be assessed under Section 106 of the NHPA. A full archaeological survey and assessment of the Coastal Plain also needs to be completed. Additionally, the entire Coastal Plain of the Arctic Refuge could arguably be considered a Traditional Cultural Landscape of the Gwich'in Nation. An analysis of the area, through that framework, should be explicitly included in your work.

I don't envy you, or your colleagues – being the agency and the individuals that may become responsible for the defilement of a biologically, historically, and culturally important sacred landscape – and encourage you to take steps to prevent that from happening.

Sincerely,  
Julie Raymond-Yakoubian  
Girdwood, AK 99587