



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

---

**[EXTERNAL] Scoping comments: Coastal plain leasing**1 message

---

**erica watson** <ytalvezporquellueve@gmail.com>  
To: blm\_ak\_coastalplain\_EIS@blm.gov

Sat, Jun 16, 2018 at 11:22 AM

Erica Watson  
PO Box 69  
Denali Park, AK 99755  
[ytalvezporquellueve@gmail.com](mailto:ytalvezporquellueve@gmail.com)

To whom it may concern:

Thank you for the opportunity to comment during the scoping period on leasing in the coastal plain of the Arctic National Wildlife Refuge.

First, I will say that I do not envy your task. I come from a family and community of Department of Interior employees, and I know that, for most, it is a labor of love and passion and that passion is not for wholesale degradation of our nation's public and sacred lands. It is a travesty that you have been charged with this unethical and regressive program, dictated by a process that is being further eroded daily, and I wish you strength in doing so in a way that adheres to the values that likely landed you in the field in the first place.

I request that the Environmental Impact Statement include a No Action alternative. This administration's push to undo decades of legislative protection, which is only a sliver of time compared to the millennia of stewardship by the Indigenous peoples of what is now Alaska, is an affront to our valuation of human rights, ecological integrity of the region, and the future of our climate.

The UN Declaration on the Rights of Indigenous Peoples states that Indigenous people must be guaranteed access to their means of subsistence (*Article 20*). I should not need to restate the profound relationship between the Gwich'in Nation and the Porcupine Caribou Herd, but apparently this alone is not sufficient to prevent their own government's attempt to permanently alter the sacred and ecologically sensitive birthing grounds. I should not have to remind our government that our nation has a clear track record in its history of prioritizing colonial development over Indigenous health and survival. It is 2018. We should not be having this conversation.

The EIS must fully incorporate declarations such as the UN Declaration of Indigenous Rights, the 1987 treaty between the US and Canada, in which both nations pledged to protect the Porcupine Caribou, and incorporate the socioeconomic effects of generational trauma imposed by unwanted extractive development. Despite the swagger of Alaska's senator Dan Sullivan, this is a transnational issue, and must be dealt with not through vague unrelated threats, but through nation-to-nation negotiations between Canada as well as any Indigenous Nations who have requested that they be included in the process.

The EIS must incorporate current research on the impacts of extractive development on adjacent and dependent communities, which fall disproportionately on women and girls. As the 2017 report by The Firelight Group states, "There are systemic and historic factors that lead to patterns of violence being perpetuated in Indigenous communities, primarily on the Indigenous women and children. Industrial camps are being placed, both temporarily and in the long-term, in these contexts without considering their cumulative social and cultural effects." The EIS must demonstrate mitigation measures that will adequately address these impacts, something unprecedented in the industry's history. Something that will certainly take more than a year, as very little progress has been made in the last 240 years.

The coastal plain is integral to the migration of not only the caribou but to that of over 200 species of migratory birds. As the founding purposes of the Arctic National Wildlife Refuge state:

The Arctic Refuge is the only refuge established "for the purpose of preserving unique wildlife, wilderness, and recreational values." Specifically:

- (i) To conserve fish and wildlife populations and habitats in their natural diversity including, but not limited to, the Porcupine caribou herd, polar bears, grizzly bears, muskox, Dall sheep, wolves, wolverines, snow geese, peregrine falcons and other migratory birds and Arctic char and grayling;*
- (ii) To fulfill the international treaty obligations of the United States with respect to fish and wildlife and their habitats;*
- (iii) To provide... the opportunity for continued subsistence uses by local residents;*
- (iv) To ensure... water quality and necessary water quantity within the refuge; and*

(v) added with the passage of PL 115-97 in the 2017 tax bill, *To provide for an oil and gas program on the Coastal Plain.*

The draft EIS must explain how the FWS and BLM will address this gross incompatibility, and ensure that purposes i-iv are not diminished or otherwise compromised by an oil and gas program on the coastal plain. This includes full analysis of the aforementioned declarations and treaties, integration of studies demonstrating that while caribou are adaptable, surviving in the shadow of a pipeline is not the same as thriving along an undeveloped migration route. As section 1002 of ANILCA states, development is not to occur unless comprehensive analysis shows that it would “avoid significant adverse effects on the fish and wildlife and other resources.” Studies must account for differences in geography between migration routes of the Porcupine and other northern herds, and acknowledge the inevitability of infrastructure creep, as has occurred in the habitat of the now-nearly-extinct British Columbian woodland caribou herds. The incompatibility of extractive development and wildlife protection is starkly apparent.

New research is still emerging on the ecological connections between these species, their co-evolution, and interdependence. Adequately studying these truths will require more than the single year currently allowed under the shortened period Zinke’s secretarial order allows. For this and numerous other reasons, I request an extension in order to allow meaningful and complete study. A single migratory season is not a baseline, but a data point. The EIS must reflect this longterm variability.

Our climate is already warming at twice the rate of the rest of the planet. Fossil fuel development is the last thing the Arctic needs, and is the wrong path forward for the future of our state’s economy, communities, and health. Global scientific consensus acknowledges this, even our own state’s climate policy acknowledges this. The EIS must acknowledge the inherent risks in exploring for and developing supporting infrastructure, not to mention releasing more fossil fuels onto the market (still many years off), to our global temperatures, and the resulting impacts on Alaska communities relating to permafrost melt, coastal erosion, changes in sea and river ice, and wildlife behaviors.

Additionally, as was made evident in public scoping meetings in urban Alaska, all materials must be made available in, at a minimum, Gwich’in and Iñupiaq languages, and other Alaska Native

languages as requested. Language interpreters must be available at all public meetings (in the Fairbanks hearing, at least three languages other than English were spoken, and if BLM officials' fidgeting and phone-checking were any indication, it was clear that these voices will gladly be dismissed if not provided with trustworthy, professional translation services). Future meetings must allow the time necessary to allow speakers to finish their testimony, and to allow all those who show up to speak to do so. This means BLM must be a bit flexible in their scheduling. Bring extra coffee. Don't expect to be in bed by 10pm. If the stakes weren't so high, it would be laughable to see speakers determined by, literally, names pulled from a box, but as it is, this is making a game out of people's cultural survival and land that many hold sacred. And people are watching. As Councillor Dana Tizya-Tramm said in Fairbanks on May 29, "this is a representation of the complete degradation of (our) democracy." I would sincerely ask that you recognize your role(s) in that, and act with integrity in the coming months.

I [wrote elsewhere](#) recently about reading Dan O'Neill's *The Firecracker Boys*, about the Atomic Energy Corporation's efforts to blow up a large swath of Alaska's Arctic coast in the 1960s, as the Department of Interior repeatedly proposes these acts of terrorism against the lands it is charged with managing. The parallels are disturbingly striking across the board, but one thought I'll end with is this, from biologist and Project Chariot critic Don Foote. Foote, along with conservation writer Paul Brooks, wrote in 1962, "[I]t is up to us...to realize that another scale of values is also involved: not the precise relations between depth of burst and crater characteristics, but the precise relations between unlimited power and the awesome responsibility that goes with it."

BLM must include and implement a No Action Alternative.

Thank you for your time.

Erica Watson