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[EXTERNAL] Submission on DOI scoping consultation for Arctic Refuge

1 message

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Tue, Jun 5, 2018 at 3:32 PM

To: blm_ak_coastalplain_EIS@blm.gov

Cc: catherine.mckenna@parl.gc.ca, justin.trudeau@parl.gc.ca, chrystia.freeland@international.gc.ca, eactivist@cpawsyukon.org

Dear Ms Hayes,

I had the privilege to make a statement during the public hearing held in Anchorage. I'd like to expand on that with a written submission. I've spent six summers exploring the mountains and rivers of the Arctic National Wildlife Refuge. I've been awestruck as thousands of caribou have poured past my campsite. I've glimpsed wolverines, and stood within steps of a grizzly bear.

Few places left on earth are as wild and intact as the Arctic National Wildlife Refuge. The coastal plain of the Arctic Refuge are the calving grounds of the Porcupine Caribou herd: critical to the culture and subsistence ways of life of Indigenous peoples across northern Canada and Alaska. The importance of the Arctic National Wildlife Refuge transcends borders. It's critical that Canadian interests be included within the scope of this Environmental Impact Assessment. Following is a series of specific transboundary issues the EIS should address.

The EIS should study the importance of the Porcupine caribou herd to Indigenous communities such as Old Crow, and address the social, cultural and economic ramifications Indigenous communities may face should the health of the herd diminish.

The EIS should assess the importance of the Porcupine herd to tourism operators, outfitters and non-Indigenous hunters in the Yukon and Northwest Territories.

The EIS should evaluate the impacts of the proposed oil and gas activities on migratory birds, especially to Arctic Refuge-nesting species listed under Canada's Species at Risk Act.

The EIS should include a full accounting of the greenhouse gas emissions that would be associated with proposed oil and gas activities. This should include the upstream and downstream emissions from exploration, production and combustion of oil and gas reserves. The EIS should analyze how these emissions may hinder state, federal and global efforts to address climate change.

The EIS should assess the risks of air and marine pollution associated with the proposed oil and gas activities, with an emphasis on possible health impacts on communities within Canada. The EIS should assess how pollution may affect Beaufort Sea ecosystems, and how fish, bird and mammals of the Beaufort Sea, especially those with cultural and subsistence importance, may be impacted.

The EIS should consult with the Indigenous, Territorial and Federal Governments of Canada, as well as with scientists and Indigenous knowledge holders.

The EIS should take the precautionary principal, especially when there are gaps in data, or data is being extrapolated. For instance, modelling impacts on the Porcupine caribou herd based on data from the Central Arctic herd is highly problematic, given the differing ecological context that each herd occupies.

I urge you to ensure your environmental review process be rigorous, and address all impacts using both Western and Traditional Knowledge. I strongly believe that oil and gas extraction has no place in the Arctic National Wildlife Refuge and anticipate that a sound and evidence-based process will come to the same conclusion.

Sincerely,

MalkolmBoothroyd
Y1A 3P4cc: Hon. Catherine McKenna
House of Commons

6/8/2018

DEPARTMENT OF THE INTERIOR Mail - [EXTERNAL] Submission on DOI scoping consultation for Arctic Refuge

cc: M. Justin Trudeau

cc: Minister Chrystia Freeland

cc: Ms. Nadine Sander-Green