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## [EXTERNAL] Council of Athabascan Tribal Governments Arctic National Wildlife Refuge Leasing EIS Scoping Comments

1 message

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

Tue, Jun 19, 2018 at 7:03 PM

Please accept the Council of Athabascan Tribal Governments Arctic National Wildlife Refuge Leasing EIS Scoping Comments attached.

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## COUNCIL OF ATHABASCAN TRIBAL GOVERNMENTS

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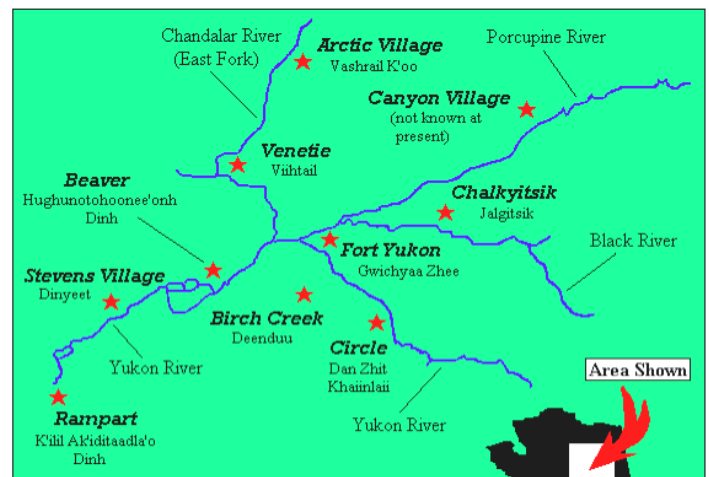
*"Protecting and enhancing our tribal members, communities & culture through self-governance"*

June 19<sup>th</sup>, 2018

### ARCTIC NATIONAL WILDLIFE REFUGE LEASE ENVIRONMENTAL IMPACT STATEMENT SCOPING COMMENTS

We, the Council of Athabascan Tribal Governments (the Council), have standing resolutions in solidarity with the Gwich'in Nation for the protection of the Porcupine Caribou Herd, their birthing and nursery grounds within the coastal plain and 1002 area of the Arctic National Wildlife Refuge since 1988. We support permanent protection of the coastal plain and 1002 area of the Refuge.

The Council is a tribal consortium founded in 1985 on the principals of tribal self-governance. The Council was formed by Gwich'in and Koyukon Athabascan tribes from the Yukon Flats region of Alaska including: Arctic Village, Beaver, Birch Creek, Canyon, Chalkyitsik, Circle, Fort Yukon, Rampart, Stevens, and Venetie. The Council's Board of Directors is comprised of 10 tribally elected Chiefs that represent the needs of their communities as identified by their respective Tribal Governments. In addition, Traditional Elder Chiefs provide guidance to the Council as an organization. The tribal leadership has clear vision: stable self-sufficient economies built upon strong local self-governance.



The purpose of the Council as mandated by their Constitution:

*shall be to conserve and protect tribal land and other resources; to encourage and support the exercise of tribal powers of self government; to aid and support economic development; to promote the general welfare of each member tribe and it's respective individual members; to preserve and maintain justice for all and, to otherwise, exercise all powers granted by it's member villages and the purposes expressed in the preamble.*

Collectively, our traditional lands in the Yukon Flats include a 55,000-square-mile area that encompasses what is now the Yukon Flats National Wildlife Refuge, and a portion of the Arctic National Wildlife Refuge. This land base stretches from the White Mountains to the south, the Brooks Range to the north, the Trans-Alaska Pipeline to the west, and the United States-Canada border to the east. Since time immemorial, the people of the region have lived in reciprocity with these lands and the resources therein which continue to hold significant historic, cultural and geographic importance to the Tribal Governments. The Council's intent is to continue that role through effective partnerships with the federal government via funding and other agreements.

## **DIRECT IMPACTS TO OUR WAY OF LIFE (SUBSISTENCE, CULTURE, LANGUAGE, SPIRITUALITY)**

Our peoples' subsistence way of life will be significantly impacted and restricted by changes in the migration, habitat, food and water resources of the Porcupine Caribou Herd and migratory waterfowl. A comprehensive analysis of subsistence use must be conducted to ensure any impacts from leasing, exploration, development, and transportation corridors can be fully understood and mitigated and to ensure compliance with the: ***Alaska National Interest Lands Conservation Act (ANILCA) of 1980 (including Title I section 101, Title III section 303, and Title VIII) and the purposes of the Arctic National Wildlife Refuge.***

The traditions of our ancestors persist through the continued practice of hunting and fishing which is inclusive of the ceremonies that accompany these cultural practices. Such traditional hunting and fishing practices provide for our social, cultural, economic, physical, and spiritual health and wellbeing. As Native peoples, access to our traditional food resources is critical to our culture, health, wellbeing, economic security and food sovereignty. The Council advocates for hunting and fishing management policies and regulations that provide for Alaska Native food security, community wellbeing, and traditional ways of life.

The Porcupine Caribou Herd (PCH) are our relatives. For countless generations, the Gwich'in people have relied upon the caribou to provide for their health, wellbeing, economic and food security. The coastal plain of the Arctic National Wildlife Refuge is considered sacred to the Gwich'in people who refer to it as, *lizhik Gwatsan Gwandaii Goodlit*, the "Sacred Place Where Life Begins."

"We are the caribou people. Caribou are not just what we eat; they are who we are. They are in our stories and songs and the whole way we see the world. Caribou are our life. Without caribou we wouldn't exist... We have been here for thousands of years. We know the weather, the animals, the vegetation, and the seasons. We are capable of living up here. And we want to educate our people as we once did, teaching our children. If others would only just respect our ways and our judgment...More battles lie ahead. Not just up here in Alaska, but all over. It will be hard. We have to work together. The Gwich'in are going to fight as long as we need to. We know that without the land we are nobody..." (*Arctic Village Elder Sarah James as retold by Art Davidson in Endangered Peoples 1993*).

Traditional hunting and fishing are central to maintaining cultural norms and language. They reinforce the deeply embedded value of a shared sense of community and responsibility for the welfare of others. By working together, Indigenous people meet and overcome the challenges found in the Alaskan outdoors. In this region, it is common among those who are better equipped to hunt and fish, to distribute food to the less well-resourced in the community. Hunting and gathering are also key components of tribal traditional living.

For some, the act of hunting itself is ceremonial. What is eaten, and what is left untouched are often life lessons retold from the elders to their young through the art of storytelling. Accordingly, subsistence is more than what Alaska Natives do; it embodies who they are as a people as traditions are passed down from one generation to the next.

The Neets'ąjį are a subset of the larger Gwich'in Nation whose territory extends from what is now known as the northeastern Interior of Alaska to the Yukon and Northwest Territories of Canada. The term "Gwich'in" refers generally to a people; however, when coupled with place-name identifiers, it literally translates to the people of a certain location. For most of our history, Neets'ąjį people lived in scattered camps moving in relation to seasonal resources. Traditional housing models such as *neevyaa zhee* (caribou skin tents) and, later, canvas tents were designed to be transportable enabling families to move between customary use areas. Life "in those days" cycled through periods of abundance and scarcity. Today, the Neets'ąjį are centralized in two villages, Vashraqį K'q̄q̄ (Arctic Village) and Vjįhtąjį (Venetie).

The sites of Arctic Village and Venetie were selected as permanent settlement for their strategic location for the reliable supply of critical resources, namely whitefish, and the regular crossing of moose, caribou and other migrating animals. It is documented within numerous studies that the migratory PCH has long been the most important means of subsistence for the Neets'ąjį Gwich'in. Before the advent of rifles, Neets'ąjį families used to camp around a caribou fence [also called corrals or pounds]. Caribou fences offer some of the oldest physical evidence of the Neets'ąjį land use patterns.

In 1983, Richard A. Caulfield led a research effort on subsistence harvests in five communities including Arctic Village, Birch Creek, Chalkyitsik, Fort Yukon, and Venetie. It is important to note that the data was collected between 1970-1982, which was post-settlement. Caulfield noted that it is probable Gwich'in hunters have harvested PCH for several centuries. Figures 9 and 10 (see next page) offer a comparison of annual cycles of resource harvesting activities in the communities of Arctic Village and Venetie. An analysis of the harvest data between the two villages shows a pattern of overlapping dependence on certain animals however, there were key differences in harvesting by time of year and by primacy as a primary or secondary activity.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Luk												
Dinjik												
Vadzaih												
Divii												
Geh												
Thaa												
Waterfowl												
Dzan												

Figure 9. Seasonal cycle of resource harvest activities, Vjijhtajj, 1970–1982. Dark grey indicates primary activity; light grey indicates secondary activity. Adapted from Caulfield (1983) Annual Cycle for Venetie (p. 178).

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Luk												
Dinjik												
Vadzaih												
Geh												
Thaa												
Waterfowl												
Dzan												
Shoh												

Figure 10. Seasonal cycle of resource harvest activities, Vashraji' K'qq, 1970-1982. Dark grey indicates primary activity; light grey indicates secondary activity. Adapted from Caulfield (1983) Annual Cycle for Arctic Village (p. 98).

The Council coauthored Technical Paper No. 377 (TP 377) with the Alaska Department of Fish and Game Division of Subsistence in 2012, *Subsistence Land Mammal Harvests and Uses, Yukon Flats, Alaska: 2008-2010 Harvest Report and Ethnographic Update*. The study notes that for “residents of communities established in locations proximate to the contemporary migratory range of the PCH, such as Arctic Village and Venetie, caribou use remains primary in importance.” TP 377 demonstrates in 2008-2009 30% of Yukon Flats households reported using caribou (primarily PCH), with 11.5 % of Fort Yukon and 98.4% of Venetie households reporting using PCH. The study demonstrates in 2009-2010 22.3% of Yukon Flats households reported using caribou (primarily PCH), with 19.8% of Fort Yukon and 39.1 % of Venetie households reported using PCH.

TP 377 demonstrates extensive caribou trading and sharing networks among Yukon Flats villages, with for example Birch Creek reporting 25% of households in 2008-2009 and 40% of households in 2009-2010 using caribou with 0 caribou harvested in both study years. This demonstrates a vast sharing network and region wide reliance on PCH. The study notes “the information from past research presented above reveal an active network of caribou barter and gift giving in several of the participating communities. This also was corroborated by the ethnographic research, which further clarified that the exchange of caribou meat among the various Yukon Flats communities is an important customary and traditional practice.”

Additionally, TP 377 demonstrates annual variance in location of harvest, with for example in 2008-2009 Venetie reporting harvesting 16.4 caribou and in 2009-2010 Fort Yukon reporting harvesting 35.2 caribou. The study noted on multiple occasions that Fort Yukon hunters have often relied upon the PCH and harvested while along the Porcupine River corridor. It is also noted on multiple occasions that hunters from neighboring villages such as Beaver, Birch Creek, or Chalkyitsik harvest PCH when they migrate within proximity to their communities, or by travelling to Arctic Village and Venetie to hunt with family. Annual variance can be largely attributed to variances PCH migrating patterns. The study notes *“Shifting seasonal caribou migration patterns determine caribou accessibility for Yukon Flats hunters. Consequently, an overview of historical and contemporary herd migration patterns is essential to understanding caribou subsistence use patterns in Yukon Flats communities.”*

It must be noted that TP377 is very limited, only covering two harvest years, and not including Arctic Village, the community with primary reliance on the PCH. We know that data is extremely limited on the historical and current harvest and use of the PCH by Arctic Village, Beaver, Birch Creek, Chalkyitsik, Fort Yukon, and Venetie, and of migratory waterfowl across the state. A comprehensive analysis of subsistence use of PCH and migratory waterfowl must be conducted to ensure any impacts from leasing, exploration, development, and transportation corridors can be fully understood and mitigated and to ensure compliance with the: ***Alaska National Interest Lands Conservation Act (ANILCA) of 1980 (including Title I section 101, Title III section 303, and Title VIII) and the purposes of the Arctic National Wildlife Refuge.***

Our peoples’ subsistence way of life will be significantly impacted and restricted by changes in the migration, habitat, food and water resources of the PCH and migratory waterfowl. All Alaskan Tribes rely upon migratory waterfowl as a critical resource in the spring. Regardless of geographic proximity to the coastal plain, many villages rely upon the seasonal harvests of such animals through extensive social and trading networks. **The Council calls upon BLM to conduct an intensive and comprehensive ANILCA 810 analysis including evaluation, notice, and hearings.**

## **DIRECT ECONOMIC IMPACTS**

**Subsistence & Village Economics.** The cost of living in the Gwich’in and Koyukon villages of the Yukon Flats is high. The average rate of unemployment within a village is exorbitant at 26.21 % (US Census 2000). The median annual income in the region is estimated at \$19,317 (US Census 2000). Additionally, high freight, utility, fuel and food costs reduce this income to half its purchasing power. If a local store exists, prices can be up to five times acceptable prices in found in the remainder of the United States. These prices, coupled with a staggering lack of job opportunities and record high unemployment, make relying on store-bought foods brought in to villages by plane or boat impossible for many. Ensuring food security for Alaska Natives requires safeguarding their ability to hunt, fish, harvest, and share their traditional foods.

Wild foods represent the overwhelming majority of the local diet, which includes everything from moose and caribou to salmon, birds, and berries. According to the Federal Subsistence Management Program, *“the state’s rural residents harvest approximately 22,000 tons of wild foods each year – an average of 375 pounds per person....Nowhere else in the United States is there such a heavy reliance upon wild foods.”* The equivalent to wild foods, organic healthy meats, would average a minimum of \$18/pound in a rural community. At 375 pounds per person, the annual value of this food source would be \$6,750 and for a family of four would be

\$27,000. This would not be possible with a median annual income in the Yukon Flats estimated at \$19,317 as above.

A comprehensive analysis of the economic value and impact of wild foods harvested from the coastal plain and 1002 area of the Refuge, namely migratory waterfowl statewide and PCH across the northeast of Alaska and northwest of Canada, must be conducted to ensure any impacts from leasing, exploration, development, and transportation corridors can be fully understood and mitigated and to ensure compliance with ***Alaska National Interest Lands Conservation Act (ANILCA) of 1980, specifically Title VIII, and the purposes of the Arctic National Wildlife Refuge.***

**Recreation.** Many Alaskan recreational outfitters rely upon the untouched beauty and splendor of the Refuge and the coastal plain for their small businesses and economic income through recreational guiding, bringing a great deal of financial resources into the state from across the nation and internationally. The rivers are critical recreational corridors within the coastal plain 1002 area of the Refuge, namely but not limited to the Canning River, the Katakaturuk River, the Sadlerochit River, the Hulahula River, and the Aichilik River. Comprehensive analysis must be conducted to ensure impacts from leasing and transportation corridors to the recreational guiding community can be fully understood and mitigated.

**Health Impacts.** Economic impacts of severe health impacts and severe health disparities must be included in the EIS. Increasing health disparities such as obesity and diabetes are costly to health care systems including Indian Health Service and State of Alaska Public Health (see also DIRECT HEALTH & WELL BEING IMPACTS).

**Climate Change.** Economic impacts of rapid and drastic changes caused by climate change must be included in the EIS (see also CLIMATE CHANGE IMPACTS).

## **DIRECT HEALTH & WELL BEING IMPACTS**

The EIS must adequately address all potential health impacts to affected communities including (but not limited to) Arctic Village, Venetie, Beaver, Fort Yukon, Chalkyitsik, and Circle. This analysis must consider all health impacts associated with the potential limitation to traditional harvests of the PCH and migratory birds due to shifts in migration or population crashes. Such health impacts include but are not limited to rates and occurrences of diabetes, obesity, suicide, mental illness, sexual and domestic violence. A comprehensive analysis must be conducted to ensure that impacts from leasing and transportation corridors to the health and well being of affected Alaska Native communities can be fully understood and mitigated.

Similar to the vast majority of 200+ remote Alaska Native villages, the communities of the Yukon Flats require a secure, healthy, and sustainable wild food system for their health and wellbeing. In the absence of available traditional foods, consumption patterns will shift towards cheap, easily transportable store-bought foods high in fat with low nutritional value. The influx of a cash economy will make highly processed foods more prevalent in the local diet as well. This will create an unhealthy situation within the Yukon Flats, medically, socially, and economically. If Tribal Members do not have access to healthy traditional food resources, direct health impacts from poor diet will occur.

Within the region, Tribal members, and most notably youth, have minimal opportunities for recreation aside from traditional activities. Each village has nominal playground equipment provided by the school district, which in some cases is not safe for use. In addition, each village school has an indoor gymnasium that is open during the school year. The communities have limited access to such gymnasiums, which are often half the size of a basketball court. If Tribal members do not have access to traditional harvest activities, direct health impacts from limited physical activity will occur. It has been documented time and again that the Alaska Native community is at the greatest risk for health disparities. Therefore, any health impacts from loss of access to traditional foods and physical activity associated with traditional ways of life could be devastating.

According to a study by the Alaska Native Medical Center, Alaska Native children are experiencing adult onset diabetes at three times the rate of Alaska Native adults. In a Childhood Obesity study by the State of Alaska Department of Health and Human Services (2009), 21% of the Alaska Native high school population is overweight and 13% are obese.

Statistics providing a health snapshot of the Yukon-Koyukuk Census Area (comparable to a county in the contiguous United States) as provided by CountyHealthRankings.org is also bleak. The Yukon-Koyukuk Census Region ranked 21<sup>st</sup> among 22 regions in the state in terms of Health Factors. In this calculation are statistics on Health Behaviors (including a 29% Adult Obesity rate), Clinical Care, and Social & Economic Factors (including a 31% Children in Poverty rate), and Physical Environment (including a minimal 20% Access to Healthy Foods Rate).

The State of Alaska Department of Health and Social Services produced *Childhood Obesity in Alaska* in March 2009. The report highlights the socio-economic and ethnic factors creating higher rates of obesity in remote Alaska Native populations. According to the report, 40% of children ages 2-4 who were enrolled in the Women, Infants, and Children Program (WIC) in Alaska between 2001-2005 were overweight or obese (pg. 5). The report also states that no national data exists for American Indian/Alaska Native Children, however their limited data showed Alaska Native youth had a 35% rate of overweight and obesity combined, over a 24% rate of their white counterparts. The report recognizes the lack of statewide data, but notes the trends suggest a higher prevalence of overweight and obesity among Alaska Native populations.

Globally, it has been well documented by academic researches that indigenous peoples suffer greatly when their traditional livelihoods and ways of life are impacted by oil and gas exploration and development, causing increases in suicide, mental illness, sexual and domestic violence. Alaska Natives suffer the highest suicide rates in the country. As documented by the State of Alaska Department of Health and Human Services, "Alaska has the highest rate of suicide per capita in the country. The rate of suicide in the United States was 11.5 suicides per 100,000 people in 2007. In 2007, Alaska's rate was 21.8 suicides per 100,000 people. The rate of suicide among Alaska Native peoples was **35.1 per 100,000 people** in 2007." Further impacts to increase this rate would be devastating to the Gwich'in people.

In terms of sexual violence, "Native Alaskans make up 61 percent of rape victims in the state, making Alaska Native women 9.7 times more likely than other Alaskans to be victims. Remarkable though they are, these numbers are by all accounts conservative, as the reported assault rate comprises only a portion of the overall rate of incidents." (Anchorage Daily News August 7, 2017 from State of Alaska Report). Again, it is well



documented by academic research globally these rates will increase in the wake of oil and gas exploration and development. Further impacts to increase these rates would be devastating to the Gwich'in people.

Economic impacts of severe health impacts and severe health disparities must be included in the EIS. Increasing health disparities such as obesity and diabetes are costly to health care systems including Indian Health Service and State of Alaska Public Health (see also DIRECT ECONOMIC IMPACTS).

## **DIRECT BIOLOGICAL/ENVIRONMENTAL/FISH & WILDLIFE IMPACTS**

A complete analysis of direct biological, environmental, and fish and wildlife impacts to the coastal plain and 1002 area of the Refuge must be conducted to ensure impacts from leasing and transportation corridors to all habitats and species can be fully understood and mitigated, and to ensure compliance with *Alaska National Interest Lands Conservation Act (ANILCA) of 1980 (including Title I section 101, Title III section 303, and Title VIII) and the purposes of the Arctic National Wildlife Refuge*.

The coastal plain and 1002 area of the Refuge is one of the last great intact wilderness ecosystems in the world, and any leasing and exploration will have long-lasting and irreversible effects. The Arctic National Wildlife Refuge is the largest in the nation, yet only one of three in the nation managed remotely. While we appreciate the Refuge leadership and staff, we know there is very limited and inadequate data and information regarding the Refuge, its habitats, its keystone species, and the reliance on critical and threatened resources.

**Polar Bears.** Polar bears are listed as a **threatened vulnerable species** in the U.S. under the Endangered Species Act since May 2008. The survival and the protection of the polar bear habitat are urgent, because of ongoing and potential loss of their sea ice habitat resulting from climate change. Polar bears are increasingly relying upon the coastal plain for denning, birthing grounds, and nursery grounds with multiple dens documented in the 1002 area of the Refuge. A comprehensive analysis must be conducted to ensure any impacts from leasing and transportation corridors can be fully understood and mitigated and to ensure compliance with the: *United States-Russia Polar Bear Conservation and Management Act of 2006, the Marine Mammal Protection Act of 1972, Amended 1994, and the Endangered Species Act of 1973*.

**Migratory Shorebirds.** Multiple **sensitive species** of shorebirds rely upon the coastal plain lagoon and wetlands for nesting and breeding grounds. A comprehensive analysis must be conducted to ensure impacts from leasing and transportation corridors to all species can be fully understood and mitigated.

**Migratory Waterfowl.** Multiple species of migratory waterfowl from 6 continents rely upon the coastal plain lagoon and wetlands for nesting and breeding grounds, including **threatened vulnerable species** of Steller's Eiders. A comprehensive analysis must be conducted to ensure impacts from leasing and transportation corridors to all species can be fully understood and mitigated and to ensure compliance with the *Migratory Bird Treaty Act of 1918* (see also DIRECT IMPACTS TO OUR WAY OF LIFE (SUBSISTENCE, CULTURE, LANGUAGE, SPIRITUALITY)).

**Caribou.** The Porcupine Caribou Herd (PCH) is the last great caribou herd on earth, and the only one thriving in Alaska. The PCH has been documented by scientist to have been utilizing and relying upon the coastal plain and 1002 area of the Refuge for over 2,500 years (antler carbon dating) to provide safe haven for birthing grounds and nurseries for rearing their young. For survival, the PCH rely upon the unique variety of habitats the coastal plain offers in juxtaposition and within close proximity for easy access, from the coastal wetlands and lagoons to the sedge tundra to the river corridors to the uplands. The PCH must have **free roaming mobility and access to migrate and utilize all unique of habitats of the coastal plain and 1002 to remain a productive, healthy herd.** The sedge tundra provides the most highly nutritious highly concentrated food source necessary for birthing and rearing calves. The uplands provide a dry and bug free habitat with a low density of predators also necessary for rearing calves. Limiting the PCH from any one of these critical habitats may have a devastating effect on their populations and their migratory patterns. Migratory patterns, and therefore corresponding traditional harvest levels by the Gwich'in, are subject to annual variation due to climate factors. Mobility across the coastal plain is necessary for PCH productivity. PCH have been documented to migrate in both east and west migration patterns, as well as north and south migration patterns across the coastal plain and 1002 area. Migration and range use is also variant pending the herd size, with the PCH selecting grazelands annually to avoid overgrazing. A comprehensive analysis must be conducted to ensure impacts from leasing and transportation corridors to the PCH can be fully understood and mitigated and to ensure compliance with the ***Agreement Between the Government of Canada and the Government of the United States of America on the Conservation of the Porcupine Caribou Herd of 1987*** (see also DIRECT IMPACTS TO OUR WAY OF LIFE (SUBSISTENCE, CULTURE, LANGUAGE, SPIRITUALITY)).

**Rivers.** The Staines River, the Canning River, the Tamayanak River, the Katakturuk River, the Sadlerochit River, the Hulahula River, the Akutoktak River, the Okpilak River, the Jago River, the Okerokovik River, the Niguanak River, the Angun River, and the Aichilik River are all critical water resources and habitats for multiple species within the coastal plain 1002 area of the Refuge, including but not limited to: polar bears, grizzly bears, moose, caribou, and migratory waterfowl. A comprehensive analysis must be conducted to ensure impacts from leasing and transportation corridors to each river and in turn all species can be fully understood and mitigated.

## **CLIMATE CHANGE IMPACTS**

In addition to direct impact to the critical resources of the Refuge, the coastal plain, and the 1002, an adequate EIS must include analysis of all related climate change impacts from oil and gas exploration and development. Dozens of communities in Alaska alone are suffering direct impacts of climate change including but not limited to: melting permafrost resulting in infrastructure and transportation impacts; severe erosion resulting in forced relocation and dispossession of entire communities; rapid and drastic habitat change resulting in rapid and drastic change in critical fisheries and wildlife resources causing food insecurity; and rapid and drastic change in snow and ice patterns resulting in flooding, and infrastructure and transportation impacts. As an example, many lives have been lost across Alaska alone due to thinning ice causing unsafe travel along traditional travel routes. Alaska's indigenous peoples suffer the most severe impacts and consequences of climate change.

The social, cultural, physical health and wellbeing, economic, and national security ramifications of climate change caused by the exploration, development, and use of fossil fuels must be included in an EIS for oil and gas leasing within the Refuge coastal plain and 1002 area. Climate Change impacts, such as those listed above

in Alaska alone, are costly and have tremendous economic impact for the State of Alaska and the Nation. Such economic impacts must be included in a comprehensive analysis that must be conducted on climate change impacts to ensure impacts from leasing, exploration, and development can be fully understood and mitigated.

## **IN CONCLUSION**

The Arctic National Wildlife Refuge is the largest in the nation, yet only one of three in the nation managed remotely. While we appreciate Refuge leadership and staff, we know there is very limited and inadequate data and information regarding the Refuge, its habitats, its keystone species, and the reliance on critical and threatened resources. We also know the Gwich'in people hold the most intimate, rich, and complete knowledge of their traditional territories.

To be adequate and thorough, to meet legislative and regulatory requirements the EIS must include comprehensive analysis and studies to ensure all potential impacts from leasing within the Arctic National Wildlife Refuge coastal plain and 1002 are mitigated and to ensure compliance with all required standing state, federal, and international laws. This must be done in good faith to meet the DOI's trust responsibilities to Tribal Governments and to the American people.

We continue to ask that the entire EIS process, including the ANILCA 810 review and NHPA 106 analysis, are carried out in good faith, are comprehensive, holistic, and thorough. BLM must:

- Ensure the ANILCA 810 analysis is conducted with adequate tribal consultation, that addresses subsistence impacts for all communities that depend on fish and wildlife that rely upon the coastal plain;
- Ensure the NHPA 106 analysis is conducted with adequate tribal consultation, at minimum with the Tribal Governments of Arctic Village, Venetie, Fort Yukon, Circle, Chalkyitsik, Beaver, and Eagle;
- Ensure all Tribal Government Cooperating Agency requests are honored, as well as Government to Government consultation requests; and
- Ensure all Cooperating Agency Tribal Governments are adequately and meaningfully included in the EIS process.

As Native peoples, without access to our traditional food resources our health, our wellbeing, our economic security and food sovereignty are threatened. We thank you greatly for your time and due diligence in this process. Your actions will have significant impacts on the wellbeing of our Tribes.