
From: Hayes, Miriam (Nicole) <mnhayes@blm.gov>
Sent: Thursday, March 7, 2019 12:20 PM
To: coastalplainAR; Sean Cottle
Subject: Fwd: [EXTERNAL] Comments on Draft EIS

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From: **Aidan Castle** <aidan.s.castle@gmail.com>
Date: Thu, Mar 7, 2019 at 11:18 AM
Subject: [EXTERNAL] Comments on Draft EIS
To: <mnhayes@blm.gov>
Cc: <ryan@northern.org>

Nicole Hayes
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222 West 7th Avenue, Stop #13
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Re: DOI-BLM-AK-0000-2018-0002-EIS, Coastal Plain Oil and Gas Leasing Program

Dear Mx. Hayes,

Thank you for the opportunity to comment on the current Draft EIS for the Coastal Plain Oil and Gas Leasing Program. I am an Alaska resident writing to voice concerns over the Draft EIS, specifically about its potential impacts on the the PCH and the Gwich'in people.

A key area of my concern with the current Draft EIS is that it substantively equates the Porcupine Caribou Herd with the Central Arctic Herd. I feel that such a comparison is invalid, as the herds are so different from one another. For example, the PCH is significantly larger and denser than the CAH. In order to validly assert that the PCH will be robust to disturbances from oil and gas extraction because the CAH has endured such disturbances, the EIS must scientifically demonstrate that the CAH and the PCH are equivalent. The current Draft EIS does not do this, and, thus, fails to achieve the precedent necessary to proceed with the leasing process.

In not substantiating the comparison of the PCH to the CAH, the current Draft EIS also, by extension, fails to account for the potential damage to the subsistence practice of the Gwich'in people residing in the Coastal Plain area. The Gwich'in have been residing in this area for 20,000 years. Caribou from the PCH are an irreplaceable food source, as well as a cultural base. A failure to demonstrate that the CAH and PCH are genuinely equivalent is a failure to account for the true impact of Coastal Plain oil and gas extraction on the Gwich'in. The inadequacies of the current Draft EIS thereby present a human rights issue.

This issue is important to me because the Arctic National Wildlife Refuge is home to animals and people who have inhabited it harmoniously for thousands of years. It is also some of the last arctic habitat not currently open for oil drilling. Oil and gas extraction taking place in this area stands to have irreversible negative impacts on the wildlife, and the survival of the Gwich'in people. We have an opportunity here to save some of the last pristine habitat. If we fail to save it, it will be gone forever, and with it the 20,000-year old legacy of the Gwich'in people in the territory of the PCH.

In order to save ANWR from negative impacts relating to oil and gas extraction, we must approach any leasing with a thorough EIS that substantively accounts for potential environmental effects. The current Draft EIS for the Coastal Plain Oil and Gas Leasing Program fails to do this, particularly by the fact of its not demonstrating the equivalency of the Porcupine Caribou Herd to the Central Arctic Herd. In order to prove that the Porcupine Caribou Herd, and the life of the Gwich'in people, will not be damaged by this proposed project, modeling must be accurate. Modeling cannot be accurate if the two caribou herds have not been shown to be equivalent.

Thank you for taking the time to read my comments above. I hope that you see the fundamental importance of crafting an EIS that fully addresses the potential impacts of oil and gas extraction in ANWR.

Sincerely,
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