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*Via E-Mail*

August 2, 2019

Nicole Hayes, Project Manager  
Bureau of Land Management  
222 West 7th Avenue, Stop #13  
Anchorage, AK 99513  
[mnhayes@blm.gov](mailto:mnhayes@blm.gov)

**Re: Native Village of Venetie Tribal Government's, Arctic Village Council's, and Venetie Village Council's Comments on the Administrative Final EIS for the Coastal Plain Oil and Gas Leasing Program**

Dear Ms. Hayes:

The attached comments are submitted by the Native American Rights Fund on behalf of the Native Village of Venetie Tribal Government, Arctic Village Council, and Venetie Village Council ("the Tribes") on the Administrative Final Environmental Impact Statement ("EIS") for the Bureau of Land Management's ("BLM") Coastal Plain Oil and Gas Leasing Program ("Leasing Program").

The Tribes are deeply concerned about the level and quality of analysis contained in the Administrative Final EIS. The Administrative Final EIS fails to meaningfully address the Tribes' comments on the Draft EIS, as well as on the Administrative Draft EIS. Throughout this National Environmental Policy Act ("NEPA") process, the BLM has consistently disregarded or downplayed the comments and concerns raised by the Tribes, as cooperating agencies and in government-to-government consultations. To this end, the Administrative Final EIS fails to take a hard look at the Leasing Program's direct, indirect, long-term, regional, and cumulative impacts, including, but not limited to, impacts on the Porcupine Caribou Herd and other migratory species, subsistence, cultural resources, sociocultural systems, public health, and food security. The Tribes are deeply disturbed by the EIS's consistent minimization of potential impacts to Arctic Village and Venetie.

Finally, the Tribes strongly urge the BLM to reconsider its selection of Alternative B as its Preferred Alternative. Alternative B makes the most acres available for lease and provides the least protection for biological and ecological resources. The BLM's selection of Alternative B reflects a disregard for the concerns raised by the Tribes throughout the NEPA process. The Tribes have raised with the BLM the critical importance of the Coastal Plain to the Porcupine Caribou Herd for calving and post-calving. The Tribes have also explained the significant adverse impacts that development in the Coastal Plain would have on the herd and the Tribes. Yet the BLM failed to consider an alternative that provided meaningful protection for the calving and post-calving habitat. Now, the BLM has identified the least protective of these inadequate alternatives as the preferred alternative. Selecting

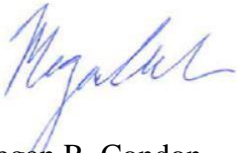
Alternative B sends a clear message that BLM views consultation with the Tribes as a mere box-checking exercise and that it has no intention of meaningfully considering the Tribes' comments and concerns.

The Tribes strongly encourage the BLM to meaningfully incorporate these comments and recommendations into the Final EIS. Should you have any questions, please not do hesitate to contact me by email at: [wfurlong@narf.org](mailto:wfurlong@narf.org); or by telephone at: (907) 276-0680.

Respectfully,



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