Loren J Karro

26239 E Buckshot Dr.

Palmer, AK 99645

907-745-3712

*lorenk@mtaonline.net*

October 17, 2022

DOI-BLM-AK-0000-2022-0003-EIS

ANCSA 19(d)1 Withdrawals EIS

Public Scoping Comments

Thank you for the opportunity to submit comments for consideration in the scoping process related to the Environmental Impact Statement to Consider the Impacts of Opening Lands Subject to ANCSA 17(d)(1) Withdrawals.

1. I am concerned that this EIS and any consideration of releasing the withdrawn lands is premature at this time. I have understood that not all of the conveyances of these lands, even where selected, have yet to be made. I personally know of at least one selected area whose conveyance has not been finalized and in fact the lands still have to be properly surveyed. What will be the effect of the proposed actions if the lands are still not conveyed but have been selected? In addition, under the Dingall Act Vietnam veterans have until the end of 2025 to apply for personal allotments of up to 160 acres of federal lands. How will the proposed actions affect these selections and future conveyances? Shouldn’t those people who have legal claims to the lands be allowed to be part of the EIS process? Many of the lands haven’t even been selected yet, so the people have no way of knowing what land status changes for which lands might affect them. I believe that this action should be postponed until all selected coneyances have been properly conveyed, and until all of the Dingall Act selections have been made, the lands surveyed, and those conveyances finalized, which would surely be much later than the Dec. 29, 2025 selection deadline.

2. The effects of releasing these lands for future uses, including mineral claims, must be carefully analyzed for the effects on climate change, including the global warming effects, the local effects on villages and peoples within and near the lands, and the compliance with National Policies and Directives. For instance, the Administration has very recently released a **National Strategy for the Arctic Region** (October, 2022). This strategy lists some Strategic Objectives as follows:

 “**Strategic Objective 2.2: Pursue International Initiatives to Mitigate Emissions in the Arctic**

The United States will work to reduce localized emissions of carbon dioxide, methane, and black carbon, through both existing and new bilateral and multilateral initiatives as appropriate to complement our global mitigation efforts. Mitigation should also include protection of habitats that store carbon, such as forests, tundra, and coastal marshes. “

 “**Strategic Objective 2.4: Conserve and Protect Arctic Ecosystems, including through Indigenous Co-Production and Co-Management**The United States must continue to pursue multilateral initiatives and research to conserve and protect Arctic biodiversity, ecosystems, habitats, and wildlife, expanding on concepts like the Northern Bering Sea Climate Resilience Area.4”

 The objectives go on to detail that “Conservation in the Arctic should be consistent with the America the Beautiful Initiative, which sets out our national goal of conserving 30 percent of America’s land and waters by 2030, as well as our international commitments to conservation and climate.” In examining the potential release of these lands, putting most of them aside without allowance for resource development would go a long way to helping achieve the “30 X 30” goals. At the very least, a detailed analysis of what the release of these lands for possible development would do to these objectives should be made and detailed in any EIS.

 In analyzing the permanent, immediate effects of possible development on any arctic and sub-arctic lands, serious consideration of the release of methane from permafrost and tundra melting and warming waters needs to be foremost. It has been documented that warming of the arctic regions is happening 3 times faster than in the rest of the world. As this warming melts permafrost and warms waters, the stored methane in them is released. Methane, while admittedly not as long lasting in the environment as CO2, is over 80 times more powerful as a warming agent. This creates an immediate and cascading effect of melting more permafrost and tundra lands and warming more water, releasing more methane, in an ultimately unstoppable spiral.

3. In analyzing the proposed land actions, of equal importance is the effect the actions might have on subsistence uses and activities. Separate, detailed studies of each section of land should be made as to the current subsistence uses on and around the target lands, including historical data, current access and harvest activities, existing shortfalls of subsistence resources (berries and edible plants, fish, birds, mammals etc) and the reasons for this.

 The EIS should include an analysis of the effects of the current levels of warming have had on each section of targeted lands in relation to subsistence resources there on, so that a reasonable consideration of what future climate changes might do to future resource harvests. If opened to mineral and gas extraction, increased methane and CO2 release would be an inevitable consequence, not just from the wells and mines themselves but from the construction and infrastructure use needed for development. Additionally, mineral resource development would mean increased human activity and ‘man camps’, which themselves contribute to release of CO2 and methane as well as increased stress on the local birds, caribou, moose etc, which can cause changes to migrations routes, calving/nesting areas and local population numbers. All of these activites directly effect, in a negative way, subsistence uses of the target lands and adjoining lands. The **National Strategy for the Arctic Region** lists a further Objective:

 “**Strategic Objective 3.2: Improve Access to Services and Protect Subsistence Lifestyles and Cultural Traditions”**

4. Consideration must be given to the effects that transfer of these lands out of protected status, and potentially out of federal hands, might have on the physical and emotional stability of the local villages and peoples. Increased climate warming will cause increased severe storms, threatening homes, infrastructures and whole villages. Increased development on neighboring lands would cause increased air, water and noise pollution, to the detriment of physical and mental health as well as the cultural and traditional activities of the local peoples.

The EIS should consider an Alternative that keeps the majority of the lands in federal, protected

status. This would be in keeping with furthering the 30 X 30 objective of the **America the**

**Beautiful Initiative**, it would be a major aid in protecting the rich carbon and methane sinks of Arctic permafrost and tundra, it would protect subsistence activities as required under Federal guidelines, it would help protect neighboring communities from adverse physical and mental stresses, and it would keep the lands available for the final conveyances of selected lands and for the selection of personal allotments as allowed under the Dingall Act.

 At the very least, I would recommend an Alternative that delays any further action or consideration of land status change, except for the aforementioned conveyances in line with Alaska Native Settlement Act and the Dingal Act, until the final conveyances of lands are finalized, sometime after the end of 2025.

I believe that each Alternative being considered should include detailed analyses of the Alternative’s effect on future legal land conveyances; on the furtherance of the goals set by the Federal directives and policies relative to Climate Change, including but not limited to the 2022 **National Strategy for the Arctic Region**, the **America the Beautiful Initiative**, and the **Executive Order on Tackling the Climate Crisis at Home and Abroad**; on all the possible effects to subsistence uses and activities on both target and neighboring lands; on all the possible effects on the local communities physical and mental health and on the community resilience to future climate emergencies such as major coastal storms; and on effects on local cultural traditions and land uses.

I appreciate the opportunity to participate in the Public Scoping Comments.

Sincerely,

Loren J Karro