ANCSA 17(d)(1) DEIS

BLM Anchorage District Office

Attn: Rachel Jones

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Anchorage, AK 99507

RE: Comments on Draft Environmental Impact Statement regarding ANCSA Sec 17 (d)(1) Withdrawals, Docket No. DOI-BLM-AK 0000-2022-EIS

Dear Secretary Haaland and State Director Cohn;

Thank you for the opportunity to submit comments on the above docket.

I am a former resident of the Northwest Arctic, a part time resident of the Alaska Peninsula town of Port Heiden, and live primarily outside of Palmer, Alaska. My family and I provide most of our protein through hunting and fishing, and share with others who can no longer provide for themselves. I am also an avid hiker, climber, and wanderer throughout the State of Alaska.

I have participated in this review process since the request for comments on the scoping process in October of 2022. In reading this DEIS, I was shocked by the generalized, inaccurate assumptions and statements, which renders the docket’s conclusions all but useless in any meaningful way. I wish I had more time to do a more detailed analysis but as I do this on my personal time, and limited timeframe was available for the response, much of which coincided with busy holidays, I will keep my comments short.

INACCURATE ASSUMPTIONS:

All of the topic analyses are formulated using a “focused analysis area”, that being the area where it was assumed that development was most likely to occur, depending on factors including the area’s proximity to “existing access or infrastructure”. Section 3.1.1.2 says that

“For all categories of development described in the RFD scenario, the analysis assumes that the likelihood of both exploration and development becomes lower with distance from the existing road system, railbelt, freshwater barge routes, and ports due to the cost to construct and maintain access to a potential development site.”

This presumption is faulty to the extreme. In Alaska right now, road building is being considered or has been considered in the Arctic from the haul road to the Ambler Mining District; in the Susitna drainage; from the West side of the Alaska Peninsula port to the Pebble Mine site; and many other areas. Additionally, roads specifically to utilize mineral deposits in remote areas have already been built, notably the haul road (Dalton Highway) itself and the road from the Red Dog mine to the coast. There, a whole new port was also built to ship ore out. The State of Alaska has a resource extraction mind bent that also includes possible gas pipelines and a new deeper water port in Nome. Your limited development analysis of the withdrawal of these lands from protection is very notably flawed and should be discounted. All of the land in question should be analyzed for possible future development should the lands be withdrawn from protection, and especially those lands that might be conveyed to the State of Alaska. Instead, you conclude in section 3.2.1.2.2, that “Although development outside of the focused analysis area is not reasonably likely to occur, due to the sheer number of acres where the withdrawals would be revoked, there is potential for some type of change to occur, though that potential is low, and it would be too speculative to try to describe the details of such change.”

I believe that a much broader analysis of the possible effects of development for all the alternatives, for all the categories, should be required. At present, for some categories there seems to be no analysis of the effects of possible withdrawals for whole study areas. Notably, Section 3. 6 on Environmental Justice states that

 “Revocation of 17(d)(1) withdrawals could affect environmental justice populations in two primary ways. First, on lands that lose Federal subsistence priority, hunting competition in certain areas may increase, thus reducing the availability of those resources to local subsistence users. Second, development in the focused analysis area (i.e., priority conveyances that are most likely to be developed) could affect subsistence resources by causing deflection, displacement, changes in resource behavior (including migratory behavior), or through the introduction of contaminants.

 Impacts would be most likely to occur for communities near or with use areas overlapping with the focused analysis area”

This incorrectly limits the analysis of a very important subject, environmental justice, of those few communities that are near or within the “focused analysis area”, when it should rightly be analyzed for any lands that are open to possible future development, regardless of their proximity to existing infrastructure.

I also note that your ‘focused analysis area” under section 3.3 CLIMATE show that in the Kobuk-Seward Peninsula area, NO lands are shown to be likely to be developed for leasable minerals where 17 (d)(1) withdrawals would be revoked (table 3.3-4). This seems very unlikely in view of the present Ambler Mining District, and the proposed Ambler Mining District Access Road.

ENVIRONMENTAL CONSEQUENCES

Additionally the environmental consequences reached throughout the DEIS do not take into consideration the long term and cumulative effects of climate change exasperation through possible development. The climate change issue is only dealt with very summarily. There should be a significant analysis of all of the lands under consideration, not just the “focused analysis area”, as to how development on that land would effect climate change, both in the future and cumulatively.

Before withdrawing any lands from the 17(d)(1) protection, a study should be made as to how the actions would comply with the **National Strategy for the Arctic Region** (October, 2022), specifically with “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, … to complement our global mitigation efforts. Mitigation should also include protection of habitats that store carbon, such as forests, tundra and coastal marshes.”

And with “Strategic Objective 2.4: Conserve and Protect Arctic Ecosystems, including through Indigenous Co-Production and Co-Mangement:

 “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.”

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.” Keeping these lands under BLM protected status would go a long way to furthering, not defeating this initiative’s 30 X 30 goal. 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 form 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 a long lasting in the environment as CO2, is over 80 times more powerful as a warming agent. This creates an immediate and cascading effect, in an ultimately unstoppable spiral.

Again, the climate change effects of possible development must be analyzed for any and all lands being considered to be withdrawn form 17 (d)(1) protection, without the limitation of studying only a “focused analysis area”.

SUBSISTENCE AND CULTURAL CONSIDERATIONS

The EIS should include an analysis of the effects the current levels of warming have had on each section of lands which might be withdrawn from the 17 (d)(1) protection, so that there can be a reasonable consideration of what future climate change due to possible development might do to future resource harvests. Future development possibility and its effects on subsistence resources, cultural traditions, mental and physical health, and cultural resources needs to be analyzed for **ALL** of the lands subject to possible withdrawal from protection. Providing alternative sources of protein to make up for missing subsistence resources alters the social patterns of the local communities, is at best a stop gap measure, and consideration of these as mitigation measures is culturally insensitive and inappropriate.

Additionally, the possible conveyance of these lands out of federal status, as noted, could have severe consequences on the subsistence classifications and harvest availability of the local peoples.

CONCLUSIONS

I urge BLM to select Alternative A, the No Action Alternative, until and unless **ALL** of the 17(d)(1) lands are properly analyzed as to what future development could mean to the landscapes, the flora, the wildlife, the birds, the cultural and historic resources, the subsistence rights, and the well being of the local peoples who inhabit or use the target and surrounding lands. I believe that under such an analysis, the only logical conclusion then will be to keep protection on the great majority, if not all, of the 28 million acres under review.

Any possible land withdrawal should be evaluated in keeping with furthering the 30 X 30 objective of the **America the Beautiful Initiative;** the strategic objectives of the **National Strategy for the Arctic Region,** and follow the **Executive Order on Tackling the Climate Crisis at Home and Abroad.**

I would like to think that our government would be taking a proactive stance to protect these wild, intact landscapes as the national treasures that they are. I would like them to be available to the people that have used them for many generations, and be available for our grandchildren and great grandchildren also. I would hate to see our own government taking a stance that would threaten the deep cultural traditions that go with respect for and harvesting from the lands. The pristine connectivity of these lands sustains populations of fish, mammals, and migratory birds, many of which are threatened or have rapidly dwindling populations. The undeveloped lands also provide for more then 100 Alaska Native communities, and help to mitigate climate change threats. The 28 million acres are natural carbon sinks, on an unequaled scale nationally. The DEIS itself recognized that lifting the protections, opening the lands to development and resource extraction, will only make the current climate change patterns worse, as well as degrade the air, water and soils on it and the surrounding lands.

PLEASE keep these considerations foremost in mind, and select Alternative A, retaining protection of all of the 28 million acres under consideration.

Thank you again for the opportunity to comment.