

**Eastern Interior Alaska Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
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**In Reply Refer To:**  
OSM 23132

Steven M. Cohn, State Director  
Bureau of Land Management  
222 W 7th Ave., #13  
Anchorage, AK 99513

**RE: Coastal Plain Draft Supplemental Environmental Impact Statement Comments (DOI-  
BLM-AK-0000-2021-0006-EIS)**

Dear Mr. Cohn,

I write to you on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to provide comments from the Council regarding the Coastal Plain Draft Supplemental Environmental Impact Statement (SEIS).

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Eastern Interior Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting on October 4-5, 2023, in Arctic Village. Among the items discussed was the Coastal Plain SEIS. The Council is concerned about the negative impacts that drilling for oil on the coastal plain may have to caribou migration, subsistence practices, the environment, and residents of nearby communities. Previous studies, such as Fullman et al. 2021<sup>1</sup>, have shown that the presence of roads and other permanent infrastructure can affect caribou movements and subsistence hunting. Changes in herd migration or use of the coastal

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<sup>1</sup> Fullman, T. J., Wilson, R. R., Joly, K., Gustine, D. D., Leonard, P., and Loya, W. M. 2021. Mapping potential effects of proposed roads on migratory connectivity for a highly mobile herbivore using circuit theory. Ecological Applications 31(1):e02207. 10.1002/eap.2207

plain as calving grounds due to development and drilling activities could impact the Porcupine caribou herd population and abilities of regional residents to meet their subsistence needs. These caribou are a vital subsistence resource to residents of Northeast Alaska and neighboring Canadian territories. Climate change is already impacting the Arctic landscape and its residents. Development of permanent infrastructure and the potential for oil spills and leaks will add further threats to an already fragile and changing ecosystem.

The Neet'sai Gwich'in of Arctic Village consider the Porcupine caribou calving grounds to be sacred lands and have been relying on these caribou for millennia to fulfill cultural and nutritional needs. Our Council requests that any development planning within the Coastal Plain Project Area directly involve the nearby communities, such as Arctic Village and Kaktovik, in a meaningful way from start to finish. Community representatives should have designated seats on any planning and monitoring teams to ensure that local and indigenous knowledge is included throughout the lifecycle of the proposed project, not just during the scoping and EIS processes.

Additionally, our Council is concerned about the increased presence of non-local workers coming to this region. Not only can this have negative social impacts on rural residents, it may increase the number of non-local hunters and competition for important wildlife resources used for subsistence such as caribou and sheep.

The Council thanks you for considering our comments. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator, Brooke McDavid, at (907) 891-9181 or [brooke\\_mcdavid@fws.gov](mailto:brooke_mcdavid@fws.gov).

Sincerely,



Sue Entsminger, Chair

cc: Federal Subsistence Board  
Eastern Interior Alaska Subsistence Regional Advisory Council  
North Slope Subsistence Regional Advisory Council  
Office of Subsistence Management  
Interagency Staff Committee  
Manager, Arctic National Wildlife Refuge  
Deputy Commissioner, Alaska Department of Fish and Game  
Special Projects Coordinator, Alaska Department of Fish and Game  
Administrative Record