



KAWERAK, INC.

Tungwenuk Family Qupak Design, used with permission

January 4, 2021

REPRESENTING

Brevig Mission

Sitaisaq

Council

Akauchak

Diomede

Injaliq

Elim

Neviarcuarlug

Gambell

Sivuqaq

Golovin

Chinik

King Island

Ugiuvak

Koyuk

Kuuyuk

Mary's Igloo

Iglaaruk

Nome Eskimo

Sitnasuami Inuit

Savoonga

Sivungaq

Shaktolik

Saktuliq

Shishmaref

Kigiqtaq

Solomon

Anjuutaq

St. Michael

Taciq

Stebbins

Tapraq

Teller

Tupqaḡruk

Unalakleet

Uḡalaḡiq

Wales

Kinigin

White Mountain

Natchigvik

BLM Director (210)
Attention: Protest Coordinator
P.O. Box 261117
Lakewood, CO 80226

Via National Register NEPA Link
<https://eplanning.blm.gov/eplanning-ui/project/36665/570/8001884/comment>

RE: Bureau of Land Management, Bering Sea Western Interior (BSWI), Resource Management Plan (RMP) Protest

Kawerak, Inc. is the regional nonprofit tribal consortium for the Bering Strait region and participated in the scoping and planning process and has standing to file this protest to the BLM regarding its BSWI RMP. The Bering Sea Western Interior (BSWI) Resource Management Plan (RMP) area comprises millions of acres within the traditional territories of Alaska Native people. Kawerak disagrees with the decision of the BLM Director to issue the BSWI RMP because it does not reflect the local and regional concerns to keep the nature of the pristine wilderness intact. If future land management actions and site-specific implementation decisions of the BSWI RMP are implemented with the present multiple use mandates, it will impact the lives of local people and those of future people to the detriment of their liberty.

BLM failed to adequately analyze and disclose the direct, indirect, and cumulative impacts of the agency's preferred alternative and correspondingly, the impacts Alternative E will have on air, water, human health, climate change and longstanding Alaska Native use and occupancy. Finalizing the BSWI RMP as released, would be dramatically out of step with the realities of scoping and community collaboration. When the BLM considered *Actions Common to All Action Alternatives*, it failed to disclose the burden on communities or how traditional use and occupancy would be affected. On page 2-107 the BLM indicated the following: *"The BLM would coordinate and collaborate with rural communities in the ongoing implementation of this RMP. Avenues for this collaboration include the NEPA and ANILCA 810 processes and associated opportunities for public involvement. BLM would also actively coordinate our management activities with the goal of minimizing burdens on communities for multiple planning processes"*

The BLM has failed to coordinate scoping and planning because of limited community meetings and no meetings in Bering Strait region communities except Unalakleet. Such a limited meeting schedule fails to meet the commitments BLM stated in its considerations for all actions common to each alternative.

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As noted on page 3-3, the BLM failed to address the impacts of climate change when it noted the following common to all alternatives: *“Negligible amounts of GHGs produced from surface-disturbing activities. Permafrost degradation due to climate change undetermined at this time.”*

The BLM failed to assess a significant contributor to global climate change as a result of this plan and climate change. Local and regional residents have raised the impacts of climate change and consider it one of the more serious impacts that require mitigation. On a global scale permafrost may release greenhouse gases that may impact the climate¹ for decades.

As noted on page 3-201 the BLM failed to address human health as follows: *“Because the BLM’s mission is to manage resources and opportunities on lands it manages, it cannot directly address or attempt to resolve many social issues and trends facing rural communities in the planning area.”*

Because BLM chose not to address social issues it completely failed the fundamental underpinnings of an EIS for this RMP to address issues affecting the quality of the human environment² Also on page 3-201 the BLM concluded the following: *“Alternative B is the most restrictive (and Alternative E is the least restrictive) to activities that could adversely affect subsistence resources.”* The BLM is acknowledging that its preferred alternative has the greatest potential to impact the subsistence lifestyle. Despite the overwhelming public comments that subsistence is vitally important, BLM has wrongly chosen the most destructive alternative that would impact the quality of the human environment.

BLM has failed to implement Alaska Native Interest Lands Conservation Act (ANILCA) findings and will allow management measures that have the greatest potential to impact the subsistence lifestyle. Though BLM held ANILCA hearings, the BLM essentially ignored the findings of those hearings. The comments of regional residents, indicated support for something along the lines of Alternative B was well established. It is as if the BLM arbitrarily chose an alternative that is the least consistent with regional resident’s concerns for their own future and then claims the public process was in compliance with NEPA. BLM’s decision will impact the quality of the human environment to the detriment of the subsistence lifestyle.

The BSWI RMP violated NEPA by adopting Alternative E; because there was a limited public comment period, no extensions to the public comment period were granted meaning community environmental justice was impacted, and cooperating agencies had mere days to comment on preliminary alternatives. Because BLM failed to provide an adequate public process, millions of acres may be subject to surface-disturbing

¹ [The Arctic’s thawing permafrost is releasing a shocking amount of dangerous gases \(nationalgeographic.com\)](http://nationalgeographic.com)

² <http://ceq.hss.doe.gov/nepa/regs/nepa/nepaeqia.htm>

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activities where none existed before. The new Alternative E is directly contrary to the comments received from a majority of local people.

The BSWI RMP prioritizes development over protection of public health, safety, the environment and wildlife, which directly conflicts with local concerns. BLM indicates in the executive summary on page x the need for this RMP to provide guidance that will address the significant alterations in resources, and circumstances. Though climate change has changed some aspects of the land; the resources have essentially stayed the same through indigenous land management and indigenous participation in resource management. Though community patterns of use may have changed in some ways, communities still depend on subsistence as they have for millennia. BLM asserts that there are major changes which require a revised RMP but has not provided any evidence of changes. Because of the long standing unchanging nature of the lifestyle of the subsistence livelihood BLM must not adopt Alternative E. Residents of this region have enjoyed a pristine wilderness with little alteration. The BSWI RMP as it exists now is a dramatic change in the nature of land management for this area and may be the causal factor which contributes to the degradation of the subsistence lifestyle for generations to come.

Kawerak appreciates BLM's consideration of this protest. Kawerak participated in scoping and the public process and will be negatively impacted by the decision of the BLM to adopt alternative E for the BSWI RMP. For the reasons described above, BLM failed to prepare an EIS that fully considers the impacts to the quality of life of the people within the BSWI RMP.

Sincerely,
KAWERAK, INC.



Melanie Bahnke, President

cc:Senator Lisa Murkowski
Senator Dan Sullivan
Congressman Don Young

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