October 21, 2025

Via email: CD8EIS@dowl.com

Tyler Marye, USACE Alaska District Regulatory Division
P.O. Box 6898
JBER, AK 99506-0898

RE: Scoping Comments on the Proposed CD8 Development (POA-2025-00203)

Dear Tyler Marye,

Grandmothers Growing Goodness (GGG), Sovereign Inupiat for a Living Arctic (SILA), and Native Movement appreciate the opportunity to provide scoping comments on the proposed CD8 Development, a ConocoPhillips oil project in the Colville River Delta near Nuiqsut, Alaska. GGG is an Inupiat group in Nuiqsut focused on elevating the understanding and protection of Iñupiat culture and people from industrial impacts and supporting our participation in decision-making. SILA's mission is to foster healthy communities – spiritually, mentally, and physically – by sustaining the connection between people, culture, and land. Native Movement is a grassroots Alaska Native organization building people power, rooted in an Indigenous worldview, for healthy, sustainable, and just communities for all.

We are deeply concerned that this project could significantly harm the fragile Arctic environment and the traditional way of life of Nuiqsut residents. Our comments below identify key issues that the Corps must address in the Environmental Impact Statement (EIS) and Clean Water Act (CWA) §404 permitting process. We urge the Corps to uphold its legal duties under the National Environmental Policy Act (NEPA) and CWA by fully evaluating reasonable alternatives and taking a hard look at all direct, indirect, and cumulative impacts on waters, wildlife, and people.

I. Purpose and Need

The Corps must define the project's purpose and need in a manner consistent with NEPA's requirements and the public interest. This section of the EIS should not be framed so narrowly as to preclude consideration of reasonable alternatives. Instead, the purpose should reflect a legitimate public need (if any) for additional oil development, balanced against mandates to protect wetlands, subsistence resources, and public health. Notably, under the CWA §404(b)(1) Guidelines the Corps can only permit the "least environmentally damaging practicable alternative" (LEDPA) for achieving the basic project purpose. This legal requirement means the project's purpose and need must be articulated broadly enough to allow for less-damaging alternatives (such as different locations) to be fully examined.

The purpose and need statement should explicitly recognize the Corps' duty to protect aquatic resources and subsistence uses, not just the applicant's commercial objectives. In evaluating need, the Corps should consider contemporary circumstances such as climate change and energy trends. The Arctic is warming rapidly, directly threatening our villages; at least a dozen Alaska Native communities are facing relocation due to coastal erosion and permafrost thaw. Approving a new fossil fuel project that would contribute further to greenhouse gas emissions and climate impacts raises serious questions of public necessity. GGG urges the Corps to scrutinize whether expanding oil production in this region is truly in the public interest, given the project's foreseeable costs to wetlands, wildlife, and the Nuiqsut community.

II. Scope of Analysis and Connected Actions

The scope of analysis must be sufficiently broad to include all connected, similar, and cumulative actions related to CD8. The scoping process should identify all access roads, bridge crossings, pipeline tie-ins to the Alpine facility, power lines, new support pads, staging areas, and increased air and vehicle traffic.

Cumulative impacts must also be rigorously assessed. The CD8 proposal is not happening in isolation but in the context of extensive oil development already surrounding Nuiqsut, which has become encircled by industrial activity, with each project incrementally eroding the remaining undeveloped lands that the community relies on. The EIS must analyze the cumulative effect of adding CD8 to this landscape, including how incremental habitat loss, traffic, air emissions, noise, and spill risks from multiple projects combine over time. Past analyses have often siloed projects, failing to acknowledge how, for example, a new road allows greater industrial access to previously untouched areas, spurring yet more development. Here, the Corps should consider not only CD8's direct effects but how it may induce future actions (e.g. additional pads or increased drilling throughput) that would further impact the Colville Delta and Nuiqsut subsistence areas. A robust cumulative effects analysis is especially critical for resources like caribou herds, which roam across project boundaries, and for air quality and public health in Nuiqsut, where pollution from all regional sources is experienced collectively.

III. Risk of Accidents and Blowouts

History has shown that accidents in Arctic oil development are not hypothetical – they do happen, and when they do, the consequences can be severe for both the environment and nearby communities. The CD8 project must be evaluated for its accident risks, including well blowouts, pipeline ruptures, spills of oil or hazardous substances, gas leaks, and facility upsets, especially under extreme Arctic conditions. Importantly, the EIS should consider emergency response time and capacity in this remote region, and the risk to Nuiqsut residents who live just miles away.

A. Well Control and Blowouts

A blowout is an uncontrolled release of oil or gas from a well. Nuiqsut has twice in the past decade experienced blowout events in its vicinity that underscore the gravity of this risk. In February 2012, a blowout occurred at Repsol's Qugruk 2 (Q-2) exploration well about 18 miles northeast of Nuiqsut. The well encountered a shallow gas pocket which caused a gas kick and a massive ejection of drilling mud. Approximately 42,000 gallons (1,000 barrels) of drilling mud were blown out, covering tundra across an estimated 23 acres, and an unknown volume of natural gas was released into the air. Fortunately, no workers were killed and no oil ignited, but the incident was a near-miss with potentially catastrophic implications. Nuiqsut residents recall seeing a "wall of coffee-colored smoke" and smelled fumes; many suffered respiratory distress afterward. We saw unusual spikes in respiratory illness that spring, which we attribute to exposure from the blowout.

More recently, on March 4, 2022, ConocoPhillips had a major gas release and well control incident at its Alpine CD1 pad, just 8 miles from Nuiqsut. Over the course of that event, an estimated 7.2 million cubic feet of natural gas escaped uncontrolled into the atmosphere. Gas was found seeping from multiple points around the drill site. ConocoPhillips had to evacuate about 300 workers from Alpine due to the hazard. Around 20 Nuiqsut families, alarmed by the gas and aware of the risk of explosion or toxic exposure, self-evacuated for several days, despite the company initially downplaying the danger. The leak persisted intermittently for weeks until the well could be killed. Subsequent investigations by the Alaska Oil and Gas Conservation Commission revealed the cause: failure to properly cement a section of the well, which allowed gas to migrate outside the wellbore. ConocoPhillips faced fines for these regulatory violations. This incident highlights multiple concerns: (1) permafrost thaw can compromise well integrity; (2) emergency response in the Arctic can be slow – in this case it took days just to route gas to processing and weeks to fully stop the leak; and (3) community communication was lacking – Nuiqsut felt inadequately warned and was forced to take action on its own to protect families.

Given these precedents, the CD8 EIS must analyze the risk of a similar blowout or major leak at the new pad. This includes evaluating: the geological risks (shallow gas pockets, overpressured zones), the drilling plan and well design, the robustness of blowout preventers (BOPs) and other control equipment, and the company's worst-case discharge estimates. We expect the EIS to include a Worst-Case Discharge (WCD) scenario, detailing how much oil or gas could flow in an uncontrolled situation and how far it could spread. The Corps should consult AOGCC or require

ConocoPhillips to present evidence that they have sufficient redundant safety systems and updated practices to prevent another event like 2012 or 2022. NEPA's "hard look" means assuming that accidents could occur despite precautions; thus the EIS should model the environmental impacts of a serious blowout: e.g., fire/explosion potential, air toxics plume dispersion toward Nuiqsut, oil or chemical spread on tundra or waterways, and impact radius for an evacuation. Human safety is paramount – if a blowout at CD8 ignited, Nuiqsut could be downwind of toxic smoke or even in a blast radius if gas accumulated.

B. Pipeline Leaks and Spills

The CD8 project will involve pipelines carrying produced fluids (oil, gas, water) from the pad to existing processing. Any new pipeline crossing wetlands and rivers introduces spill risk. Corrosion, frost heave, or physical damage (e.g., from flooding or ice) can cause leaks. The EIS should identify all pipelines and flowlines associated with CD8, their length, contents, and the measures to detect and respond to leaks. A small pinhole leak in winter could go undetected until a substantial amount has spilled. Oil spills in Arctic wetlands are notoriously difficult to clean, especially if they occur under ice or snow. The Colville Delta's many channels mean oil could quickly spread into fish-bearing waters and under ice where cleanup is nearly impossible. The spill response time is another critical factor – the nearest response equipment might be at Alpine or Deadhorse, but bad weather or darkness can delay deployment of crews. The EIS should analyze a scenario like a pipeline rupture releasing oil that could reach the Nigliq Channel or Colville River. It must ask: how quickly can response crews get on-site (considering sometimes blizzards ground aircraft), and what quantity of oil could be released before containment? Nuiqsut residents have repeatedly expressed concern that in an event of a major blowout or spill, the community itself does not have adequate resources to respond or medical capacity to treat exposure.

Beyond blowouts and pipelines, other accidents could include: tank ruptures, explosions or fires at the drill rig or camp, well explosions during flowback, and loss-of-well-control during fracking. The hazardous materials on site (fuel, chemicals, waste) should be catalogued and potential release scenarios given.

C. Community Risk and Communication

A key lesson from prior incidents is the importance of transparent communication with the community. During the 2022 leak, many Nuiqsut families felt they had to rely on their own observations and mistrusted the initial reassurances from the operator. The Corps should ensure that the EIS process itself incorporates community input on acceptable risk. We also recommend the Corps require that emergency response planning is done in coordination with Nuiqsut's local government and tribal council. It is simply not acceptable to treat Nuiqsut residents as an afterthought when an emergency strikes; we need to be among the first notified and evacuated if necessary.

IV. Air Quality Impacts

Air quality in Nuiqsut and the Colville Delta region is a growing concern as industrial development increases. The EIS must thoroughly analyze the project's emissions and their potential impacts on human health, climate, and compliance with air quality standards. Key pollutants of concern include fine particulate matter ($PM_{2.5}$) (including black carbon soot), nitrogen oxides (NO_x), sulfur oxides, volatile organic compounds (VOCs, e.g. benzene), and greenhouse gases from flaring and combustion.

1. Human Health and $PM_{2.5}$

Fine particulate matter (particles ≤2.5 microns) is known to have serious health effects. Short-term and long-term exposure to $PM_{2.5}$ can cause respiratory and cardiovascular problems and has been linked to premature death. Black carbon, a component of $PM_{2.5}$ produced by combustion (diesel engines, flaring, etc.), contributes to these adverse health impacts. Nuiqsut is a small community with limited healthcare resources, and residents are already reporting alarming health statistics that correlate with increased pollution. We have observed an astounding rise in respiratory illness over the past 30 years in Nuiqsut, and approximately 70% of community members are now on respiratory aid medication (e.g. inhalers). The Corps must not ignore such community health data. The EIS should include a Health Impact Assessment or equivalent analysis of how CD8's emissions (in combination with existing sources) could affect local air pollutant levels and health outcomes (asthma, bronchitis, neurological disorders, etc.). Even if the region is technically in "attainment" for National Ambient Air Quality Standards, the margin of safety for a small village constantly exposed to industrial emissions is thin.

2. Project Emissions

The EIS should quantify emissions from all project activities, including but not limited to: construction equipment (bulldozers, haul trucks, generators), drill rig engines, camp power generators, aircraft flights (if any), road dust from vehicle traffic, and all potential gas flaring or venting during production. Each of these is a source of $PM_{2.5}$ and other pollutants. For example, unpaved gravel roads on the North Slope can generate significant dust in summer, settling on tundra and potentially affecting vegetation. Aircraft traffic (helicopters, planes) can emit NO_x and particulates and also cause localized air quality issues. Flaring deserves special attention: flares emit a host of dangerous pollutants including benzene, formaldehyde, nitrogen oxides, carbon monoxide, soot (black carbon), and fine particles.

A peer-reviewed study in Texas found that women living near areas of intense gas flaring had a 50% higher risk of premature birth compared to those with no flaring exposure.[1] Flares that burn for weeks release fine particulates and carcinogens like benzene, which likely contributed

[1] https://hscnews.usc.edu/living-near-natural-gas-flaring-poses-health-risks-for-pregnant-women-and-babies#:~:text=Researchers%20from%20the%20Keck%20School,than%20women%20with%20no%20exposure

to this outcome. While that study was in a different region, the implications apply: flaring near Nuiqsut could be affecting pregnancy outcomes and general health. The Corps should evaluate project-specific and cumulative emissions of $PM_{2.5}$ and ozone precursors to determine if Nuiqsut's air could approach levels harmful to sensitive groups (children, elders). Even if emissions do not exceed regulatory thresholds, the incremental burden on a community already over-burdened with respiratory illness must be carefully weighed under NEPA's human health analysis. The EIS should model worst-case scenarios for flaring to ensure compliance with ambient air quality standards (for SO_2, NO_2, $PM_{2.5}$, etc.). It's also important to examine toxic air pollutants (hazardous air pollutants like benzene and formaldehyde) that, while not covered by NAAQS, can impact health through chronic exposure.

Clean air is a fundamental right of the Nuiqsut people and an essential part of the environment that NEPA protects. Given the clear evidence of rising respiratory illnesses in Nuiqsut, the Corps must treat this issue with utmost seriousness. No permit should be granted unless we are assured that the air our grandchildren breathe will remain safe and clean.

V. Subsistence Impacts

Subsistence is the heart of Nuiqsut's Iñupiat culture, identity, and food security. For millennia, the people of Nuiqsut have relied on the bounties of the land and water – harvesting fish, caribou, seals, waterfowl, and more – to sustain our families and way of life. Even today, most Nuiqsut households harvest over half of their food from traditional subsistence activities, sharing the catch widely throughout the community. These practices are not just about calories; they carry deep cultural, spiritual, and educational importance, binding each generation to the land and to each other. Protecting subsistence resources and access is therefore both a legal requirement (under NEPA and ANILCA §810 for subsistence evaluation) and a moral imperative in this project review.

1. Impacts to Caribou

The Colville Delta lies at the intersection of two major caribou herds, the Teshekpuk Lake Herd and the Central Arctic Herd, which residents hunt throughout the year. Industrial development can have well-documented disruptive effects on caribou behavior and distribution. The presence of roads, pipelines, drilling rigs, and frequent human activity often causes caribou to avoid otherwise suitable habitat. Studies from existing North Slope oilfields have found that during sensitive periods like calving and mosquito season, caribou tend to avoid areas near infrastructure. Caribou may abandon preferred calving grounds close to development, forcing them into poorer habitats and prolonging exposure to insects. Large groups of caribou also have difficulty crossing roads and pipelines, especially when harassed by insects; groups of over 100 animals have been observed to rarely cross infrastructure corridors in Prudhoe Bay and Kuparuk.

The EIS must address whether the CD8 project, including new roads and pipelines, will create a barrier or deterrent to caribou movement. If so, this can directly translate into fewer hunting opportunities for Nuiqsut. Caribou avoidance could result in animals altering migratory routes away from traditional hunting camps, or delaying their movements such that hunting becomes

more difficult. We request a thorough analysis of caribou movement data (collar data) in the vicinity of CD8, and modeling of how the project might deflect migration or insect-relief patterns. Traditional knowledge should also be incorporated; Nuiqsut hunters have consistently voiced concerns that each new development pushes the caribou farther away. The Corps should consider timing restrictions on construction during peak caribou periods.

2. Impacts to Fish and Marine Mammals

As noted above, Nuiqsut residents fish year-round for species like broad whitefish (aanaakłiq), Arctic cisco (qaaktaq), and others in the Colville and nearby lakes. The development's interference with waterways, or a potential spill, could affect these fish populations and subsistence fishing. The cumulative impact of development on all subsistence resources must be considered – caribou, fish, birds, berries, marine mammals – as Nuiqsut's subsistence cycle involves a diverse harvest.

3. Access and Disturbance

The project could impact subsistence not only by affecting animal populations, but also by altering access for hunters and fishermen. A gravel road can sometimes improve access along its corridor, but it can also restrict travel across it (due to embankments or closed security areas) and concentrate disturbance. Noise from drilling, constant traffic (including heavy trucks and aircraft support), and the presence of non-local workers can dissuade community members from using areas they traditionally camped and hunted in. Many Nuiqsut residents prefer to avoid areas with active industry because the experience is diminished by noise and pollution.

4. Cumulative and Cultural Effects

The subsistence way of life is not merely about resource numbers; it is also about the cultural continuity of being able to practice traditions on one's homeland. The cumulative effect of oil development has been a steady shrinking of the open lands available for unhindered subsistence. Nuiqsut leaders have described the situation as facing dire threats daily — from health emergencies to food insecurity — with the impacts of industry surrounding the village causing physical and psychological harm. As more of the tundra becomes dotted with rigs, roads, and pipelines, the community's sense of freedom and connection to the land is eroded. These less tangible but very real cultural impacts must be considered under NEPA's human environment analysis. We ask that the Corps heed local testimony on how CD8 might compound the pressures on their subsistence lifestyle.

In sum, subsistence impacts are among the most critical issues for this project. The EIS must treat subsistence protection as a key benchmark of adequacy. The people of Nuiqsut have the right to continue hunting, fishing, and gathering as their ancestors have, and to teach our children these skills on healthy lands. Any alternative that cannot ensure the long-term viability of subsistence resources and access is simply unacceptable from our perspective. The Corps must fully evaluate alternatives or mitigation that would avoid harm to caribou migration and key subsistence areas – including the alternative of not building a permanent road (addressed

below) if that would better protect subsistence. The voices of subsistence users themselves should be prominently featured in the analysis.

VI. Water Resource Impacts

a. Wetlands and Hydrology

The proposed CD8 site lies in the Colville River Delta, a vast wetlands complex of exceptional ecological value. The Colville River Delta is the largest and most complex delta in the Arctic Coastal Plain. Its wetlands and braided channels perform critical hydrological functions, including flood attenuation, water purification, and support of aquatic food webs. Any placement of gravel fill, construction of roads and pads, or installation of culverts and bridges has the potential to disrupt these natural functions. The EIS should analyze how the CD8 infrastructure might alter surface water flow patterns, especially during spring breakup when the delta carries heavy freshwater discharge. The Corps must study whether the CD8 road and any causeways will cause ponding or erosion, and identify design measures (adequate bridge spans, culvert capacity, bridge pier design, etc.) to maintain natural hydrologic connectivity.

Wetland loss is an unavoidable impact of gravel placement. The EIS should quantify the acres of wetlands to be filled or dredged and characterize their quality and function. Wetlands in this region provide crucial habitat and are not readily restorable once damaged. The 404(b)(1) Guidelines obligate the Corps to ensure no practicable alternative exists that would have less wetland impact and still meet the project purpose. We emphasize that oil and gas development is not water-dependent, so under the regulations there is a presumption that less damaging upland or roadless alternatives are available unless clearly demonstrated otherwise. We urge the Corps to rigorously apply these guidelines. If a road/pad configuration unnecessarily sacrifices high-value wetlands when a feasible roadless or smaller-pad alternative could avoid them, the Corps must not grant the permit. This analysis goes hand-in-hand with the alternatives section (discussed below) in identifying the LEDPA. Importantly, any permitted wetland losses would require a robust mitigation plan (e.g., compensatory mitigation within the North Slope region) to comply with CWA §404 – the scoping should flag the need for such mitigation early.

b. Fish Habitat

The Colville Delta and adjacent Fish Creek system are irreplaceable fish habitats. The delta's deep channels and thermokarst lakes support at least 20 species of fish, and an estimated 70% of the North Slope's overwintering fish habitat occurs in the Colville Delta. Species include whitefish, Arctic char, burbot, grayling, salmonids, and others that are central to subsistence. Disruptions to hydrology can affect fish access to overwintering areas or alter ice conditions critical for fish survival. The EIS should evaluate potential impacts on fish migration pathways, spawning and rearing areas, and water quality. In particular, construction of roads and pipeline crossings over waterways could increase turbidity, inhibit fish movements, or change sedimentation patterns. We ask that the Corps incorporate Traditional Ecological Knowledge (TEK) from local fishermen about fish use of the area. Nuiqsut residents have extensive knowledge of these waters. Such insights can help identify critical hotspots for fish that need

protection. The Colville Delta's waters are used by the community for fishing year-round. The Corps must prioritize safeguarding these waters.

In conclusion, water resource impacts are of paramount concern. The EIS should make clear how the project will adhere to 404(b)(1) compliance by avoiding and minimizing wetland impacts to the maximum extent practicable. It should detail the project's unavoidable impacts on wetlands, hydrology, and fish habitat, and evaluate whether those impacts are justified or can be further reduced. Given the Colville Delta's international ecological significance and essential role in subsistence, the threshold for approving any wetland fill here must be extremely high.

c. Flaring

The EIS needs to disclose expected flaring volumes and their resulting emissions of CO_2 and other pollutants. If "temporary" flaring is planned during well completion or testing, quantify that. If emergency flaring could happen during upset conditions, describe the conditions and frequency.

We request that the EIS describe any commitments or regulatory requirements on flaring. The EIS should include an alternative where gas is used beneficially – perhaps supplying additional fuel to Nuiqsut or power generation – instead of flaring.

VII. Information Gaps and Missing Analyses

Through scoping, GGG has identified several information gaps that should be addressed in the EIS. The Corps must ensure it has high-quality, up-to-date data on all relevant environmental and cultural resources to support its analysis. NEPA requires agencies to disclose where information is incomplete or unavailable and, if the missing info is essential to a reasoned choice, to obtain it if feasible. Key gaps we urge the Corps to fill include:

- Baseline Health Data: As mentioned under air quality, there are clear signs of health stress in Nuiqsut (e.g. spikes in respiratory and neurological illness). However, a comprehensive baseline health study of the community is lacking in prior project analyses. The EIS should compile existing public health info and if needed, undertake additional health surveys. This will help evaluate whether project-related pollution or disturbance could worsen health outcomes. If certain data cannot be obtained in time, the Corps should acknowledge that and propose a monitoring program. It is not acceptable to ignore health simply because it's challenging to quantify all factors.

- Wildlife Monitoring and Secrecy: There is an ongoing problem of lack of transparency in wildlife studies on the North Slope that the Corps should seek to rectify for this project. Nuiqsut residents and city officials have complained that industry and agencies often keep data (like caribou collar GPS data or animal monitoring study results) under wraps. This secrecy hinders the public's ability to evaluate whether mitigation measures are effective. We specifically ask the Corps to obtain and disclose any caribou movement data around the Colville that could show changes pre- and post-CD5 and GMT developments, as this informs likely impacts of CD8.

- Permafrost and Geotechnical Data: The safety of infrastructure (well casings, pad stability, pipeline supports) in the face of permafrost thaw is a big question. The EIS should include recent permafrost maps and ground temperature data for the CD8 area.. Given that thaw-related subsidence likely contributed to the Alpine 2022 gas leak, a full analysis here is essential.

Where information gaps cannot be fully closed prior to the EIS, the Corps should clearly state so. Any critical missing info should lead to monitoring commitments. GGG expects the Corps to utilize all available science (Western and Indigenous) to inform the EIS.

VIII. Required Alternatives

NEPA's requirement to rigorously explore alternatives is "the heart of the EIS." For the CD8 project, GGG insists that the Corps analyze a full range of reasonable alternatives, including those specifically aimed at reducing environmental damage and protecting human health and subsistence. The Clean Water Act 404(b)(1) mandate to find the LEDPA dovetails with NEPA here – the EIS alternatives analysis should be robust enough to identify that LEDPA. We outline below several alternatives that should be evaluated, beyond the company's proposed action:

- No Action Alternative: This is required and must be given genuine consideration. The No Action alternative means CD8 is not constructed. The EIS should spell out the environmental benefits of No Action – e.g., no additional wetland fill, no new disturbance to caribou and fish, and no risk of spills in that area. Given the serious concerns raised, the No Action may well be the environmentally preferable option, and that must be transparently presented.

- Roadless Development Alternative: No permanent road connecting CD8 to existing infrastructure. Under this alternative, access would be by air (helicopter or airstrip) and/or seasonal ice roads/winter trails only. This alternative would avoid the year-round habitat fragmentation and subsistence access issues caused by a gravel road. It also eliminates the need for large gravel mines for road fill.

- Alternative Drill Site Location: The EIS should examine if the CD8 pad could be located in a different spot that has lower impacts.

In evaluating these alternatives, practicability (technically and economically) under the 404 guidelines will be key. We caution that what is "practicable" must consider the project purpose broadly – a slightly lower profit margin for the developer does not automatically make an alternative impracticable if it achieves the purpose. The Corps should require ConocoPhillips to provide detailed cost/feasibility analysis for each alternative rather than just taking a cursory rejection.

IX. Community Consultation and Traditional Knowledge

Meaningful community consultation and integration of Traditional Ecological Knowledge (TEK) are fundamental to this process. We cannot overstate the importance of involving the Nuiqsut

community at every step and respecting the knowledge that local Iñupiat elders and hunters hold about their environment.

We request that the Corps conduct regular, accessible meetings in Nuiqsut throughout the EIS development. This includes scoping meetings, draft EIS hearings, and special technical workshops if needed (for example, a session just on emergency response, caribou, or air quality, where community members can speak to their observations). The Corps should document how concerns raised by the community are addressed in the EIS.

The knowledge accumulated by Nuiqsut Iñupiat over generations is a rich source of environmental insight. We urge the Corps to incorporate our knowledge throughout the EIS.

The Corps should explore mechanisms to formally involve the Tribe in monitoring and mitigation enforcement. We also encourage the Corps to let the EIS reflect cultural values and not just quantifiable metrics. For instance, the concept of "Inupiat life, health, safety, culture, and tradition" itself should be considered an important resource to protect. The EIS can and should discuss how each alternative would either support or undermine the community's ability to continue its traditions.

X. Community Safety and Health Research Prerequisites

Given the documented history of blowouts, gas leaks, and inadequate emergency communication in the Nuiqsut region, we strongly urge the Corps to require a funded, community-led evacuation planning process as a prerequisite for any approval of the CD8 project. This plan must include:

- Dedicated funding for evacuation logistics, shelter, transportation, and communication systems tailored to Nuiqsut's needs.
- Coordination with local leadership, including the tribal council and city government, to ensure culturally appropriate and timely protocols.
- Pre-construction implementation, so that evacuation readiness is in place before any ground disturbance or drilling begins.

This is not a hypothetical concern. Past incidents have forced families to self-evacuate without support, placing elders, children, and medically vulnerable residents at risk. A proactive evacuation plan is essential to uphold public safety and environmental justice.
In addition, we request that the Corps require comprehensive health research as a foundational component of the Environmental Impact Statement. This must include:

- A baseline health study of Nuiqsut residents, including respiratory, neurological, and reproductive health indicators.
- A longitudinal monitoring plan to track health outcomes over time, especially in relation to air quality, water quality, and subsistence access.
- Parallel ecological health assessments of caribou, fish, and other subsistence species, incorporating both Western science and Traditional Ecological Knowledge.

These studies must be conducted independently, with full transparency and community oversight. Without robust health data, the Corps cannot fulfill its NEPA obligations to assess human and environmental impacts. No permit should be granted until these prerequisites are met.

In summary, we urge the U.S. Army Corps of Engineers to conduct a comprehensive, rigorous, and culturally-informed review of the proposed CD8 Development. We also call on the Corps to uphold the legal standards of the Clean Water Act by only permitting the Least Environmentally Damaging Practicable Alternative after exhausting all options to avoid and minimize damage. The people of Nuiqsut have borne many impacts from oil development; their health, rights, and traditions must be given the highest priority in deciding whether and how CD8 proceeds.

Quyanaqpak for the opportunity to comment. We look forward to continued dialogue and to reviewing the Draft EIS with the hope that our concerns and recommendations will be meaningfully incorporated.

Sincerely,

Grandmothers Growing Goodness
Sovereign Iñupiat for a Living Arctic
Native Movement