



March 12, 2019

Bureau of Land Management, Alaska State Office
Attn: Coastal Planning Leasing Program EIS
222 West 7th Avenue #13
Anchorage, Alaska, USA
99513-7599

Re: Coastal Plain Oil and Gas Leasing Program Draft Environmental Impact Statement

The Government of Yukon has reviewed the Coastal Plain Oil and Gas Leasing Program draft Environmental Impact Statement (draft EIS) that the Bureau of Land Management is undertaking to implement the leasing program pursuant to the Tax Act (Public Law 115-97, Dec. 22, 2017). Government of Yukon's formal response to the draft EIS is provided in the attached document.

The Government of Yukon's review concludes that the draft EIS lacks sufficient information to assess the significance of environmental and socio-economic effects which are likely to result from the proposed oil and gas leasing program alternatives in the 1002 lands of the Arctic National Wildlife Refuge. Key concerns requiring more comprehensive analysis of potential adverse impacts from the proposed activity include transboundary impacts to the Porcupine caribou herd, the South Beaufort polar bear subpopulation, subsistence users of the Porcupine caribou herd, wetlands, and food security in North Yukon. Analysis should also be completed on transboundary impacts to tourism.

The Government of Yukon requests that a supplemental EIS to the draft EIS be prepared. Per the 2005 Council on Environmental Quality guidance, a supplemental EIS must be considered when "There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts."

Government of Yukon requests this for the following reasons:

- We have identified significant new information in the independent vulnerability Porcupine caribou herd assessment, which identifies a high risk to herd sustainability;

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- The draft EIS presents inadequate alternatives as a result of inaccuracies or deficiencies in information;
- The lack of quantitative analysis in the draft EIS has led to an incomplete understanding of effects and therefore poorly informed the construction of project alternatives;
- No alternative was presented that analysed the 800,000 acre minimum lease area requirement identified by Public Law 115-97. All action alternatives exceed the area minimum; and
- A comprehensive transboundary effects assessment is missing from the draft EIS.

Our technical experts are available to provide clarification or otherwise support our submission. Please direct correspondence and information updates to Dennis Berry, Assistant Deputy Minister, Environmental Sustainability, Government of Yukon's designated contact for the draft EIS process.

Mahsi,



Pauline Frost
Minister of Environment

Attachments: Appendix 1: The Government of Yukon's comments on the Coastal Plain Oil and Gas Leasing Program Draft Environmental Impact Statement

Appendix 2: The Vulnerability analysis of the Porcupine Caribou Herd to potential development of the 1002 lands in the Arctic National Wildlife Refuge (Russell and Gunn 2019).