**Gwìch'inat Eenjit
Gàdatr'igwijìlcheii Gidilii**
*Gwìch'in nan, nakhwek'yùu ts'àt gwitr'it
tthak nakhwidavee gwiheezàa eenjit*

Gwich'in Tribal Council
Gwich'in land, culture & economy for a better future

November 6, 2020

Sarah LaMarr
U.S. Department of the Interior
Bureau of Land Management, Arctic District Office
222 University Avenue
Fairbanks, AK 99709

Re: Marsh Creek East Seismic Exploration Environmental Assessment

Dear Ms. LaMarr,

I am writing on behalf of the Gwich'in Tribal Council (GTC), located in the Northwest
Territories, Canada, to formally state our opposition to the Marsh Creek East Seismic
Exploration project as currently proposed.

In our review of the environmental assessment, we found that the project area overlaps
with habitats used by the Porcupine Caribou during calving and post-calving within the
Arctic National Wildlife Refuge (ANWR). As Gwich'in, it is our responsibility to protect
these Caribou which are both essential to our culture and sacred to our people. We have
consistently expressed our desire to protect the sacred lands within ANWR for the
protection of the environment and preservation of our culture for over three decades now.
To that end, we must stand against projects deemed likely to have detrimental impacts to
this herd, such as the proposed project.

The impacts of seismic exploration in this sensitive area will have significant detrimental
impacts to the Caribou and their habitat. In particular, the proposed exploration activities
extending through the end of May with clean-up occurring over the summer will
undoubtedly disturb the Porcupine Caribou at one of their most vulnerable times, the
calving period.

In addition to the immediate disturbance of the Porcupine Caribou, we know that oil and
gas exploration will have long-term, and significant, impacts to both tundra and
vegetation. The impacts to the tundra and vegetation from the seismic activities that
occurred in the mid-1980s are still present to this day. The Gwich'in depend on the
survival of the Porcupine Caribou for the sustainability of our traditions and culture for
future generations. We simply cannot support a project that will cause such long-lasting
damage to a critical habitat.

Furthermore, we must express our dissatisfaction with the assessment process. There has
not only been a lack of consideration regarding transboundary implications and cultural
values, but the entire process has been rushed and flawed. A fourteen-day window to
comment on a proposal with this level of environmental and cultural significance is

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wholly insufficient. It raises serious concerns regarding the adequate accommodation of the rights of Indigenous peoples in the assessment process.

Several Indigenous groups and environmental advocacy organizations have consistently defended the protection of ANWR on many fronts, including the ongoing litigation. It is our view that until the lawsuits are resolved, the Bureau of Land Management should not be proceeding with the authorization of any activities on the Coastal Plain of Alaska. Moreover, the United Nations is currently investigating the proposed development as a potential violation of the human rights of the Gwich'in in Alaska and Yukon and the Northwest Territories in Canada.

In closing, the GTC would like to reiterate that we, the Gwich'in, stand in opposition to the proposed Marsh Creek East Seismic Exploration project. We do so in defense of our cultural rights, our human rights, and in solidarity with the Porcupine Caribou who cannot speak for themselves. We urge the Bureau of Land Management to make the morally sound decision and take steps to protect the ANWR from the impacts resulting from this proposed project.

In unity with all Gwich'in,

Ken Smith
Grand Chief

cc: Kristine McLeod, GTC Deputy Grand Chief
        Les Blake, Tetlit Gwich'in Council President
        Mavis Clark, Gwichya Gwich'in Council President
        James Firth, Acting Nihtat Gwich'in Council President
        Michael Greenland, Ehdiitat Gwich'in Council President
        James Thorbourne, GTC Chief Operating Officer
        Amber Keegan, GTC Policy, Negotiations, & Communications Specialist