



Department of Environment  
PO Box 2703, Whitehorse, Yukon Y1A 2C6

October 1, 2020

The Honourable David Bernhardt, Secretary  
U.S. Department of the Interior  
1849 C Street, N.W.  
Washington DC 20240

Dear Secretary Bernhardt:

**RE: Record of Decision for Coastal Plain Oil and Gas Leasing Program**

The Government of Yukon supports and values the relationship that Yukoners have with the land and the natural environment. In northern Yukon, Indigenous people have coexisted with wildlife, and notably, the Porcupine caribou herd, for thousands of years. This relationship is an essential part of Indigenous people and culture. The Porcupine caribou herd is also an important international wildlife resource with immense value to communities across the North in both the Canada and the U.S. for subsistence, cultural practices, sustenance hunting, and scientific study.

These values were affirmed in the 1987 Agreement between the Government of the United States of America and the Government of Canada on the Conservation of the Porcupine Caribou Herd, in recognition of our transboundary roles and responsibilities. Within Canada, we also have the Porcupine Caribou Management Agreement among Canadian partners for the sustainable management of this critical herd. It is well-documented that exploration and other oil and gas industrial activity introduce high risks of significant negative impacts to wildlife populations, particularly the Porcupine caribou herd. The Government of Yukon and our partners to the have consistently identified and demonstrated the sensitivity of the caribou to development in the Arctic National Wildlife Refuge, and we have long sought the protection of the Porcupine caribou herd and their calving grounds on the coastal plains of the Arctic National Wildlife Refuge.

I write to reiterate the Government of Yukon's opposition to oil and gas lease sales on the coastal plain. The Government of Yukon submitted comments on the Coastal Plain Oil and Gas Leasing Program Draft Environmental Impact Statement on March 12, 2019. We stated concerns and identified deficiencies with the draft Environmental Impact Statement in how it considers transboundary effects, socio-economic and cultural values, as well as the level of quantitative analysis and the scope of the alternatives presented.

In addition to this overarching concern, we raised specific concerns regarding significant impacts to the Porcupine caribou herd, polar bear populations, and wetlands. The selected alternative in the Record of Decision has not adequately addressed the concerns raised, by our government, nor other agencies' concerns.

The Government of Yukon will continue to collaborate with the parties to the Porcupine Caribou Management Agreement and the Gwich'in People in advocating for the protection of the Porcupine caribou herd's sacred and sensitive calving grounds on the Alaskan coastal plain.

Mahsi,



Pauline Frost  
Minister of Environment

CC. Senator Lisa Murkowski, U.S. Senate Energy and Natural Resources Committee Chair  
Senator Joe Manchin, U.S. Senate Energy and Natural Resources Committee Ranking Member  
Rep. Raúl M. Grijalva, U.S. House Natural Resources Committee Chair  
Rep. Rob Bishop, U.S. House Natural Resources Committee Ranking Member  
Chief Dana Tizya-Tramm, Vuntut Gwitchin First Nation  
Chief Roberta Joseph, Tr'ondëk Hwëch'in  
Chief Simon Mervyn, First Nation of Na-Cho Nyäk Dun  
Grand Chief Ken Smith, Gwich'in Tribal Council