



November 6, 2020

Sarah LaMarr
Bureau of Land Management, Arctic District Office
222 University Ave
Fairbanks, AK 99709
Email: blm_ak_rdo_cp_2020_seismic@blm.gov

Dear Ms. LaMarr:

Re Marsh Creek East Seismic Exploration (DOI-BLM-AK-R000-2021-0001-EA)

The Porcupine Caribou Management Board (PCMB) represents all Canadian indigenous user groups who rely on the Porcupine Caribou herd, and our mandate includes collaborative management of the herd and protecting and maintaining its habitat.

While the PCMB submits the following comments regarding the proposed winter seismic activities within the eastern portion of the Arctic National Wildlife Refuge Coastal Plain, these comments should by no means be taken as an indication of approval of the oil- and gas-related activities being planned.

The PCMB's position is that (1) the international aspect of managing the herd and the obligations outlined in the 1987 *Agreement Between the Government of Canada and the Government of the United States of America on the Conservation of the Porcupine Caribou Herd* are once again being disrespected and ignored by Alaska's Bureau of Land Management; and (2) proposed seismic exploration activities could have significant and long-term impacts to the productivity of the Porcupine Caribou herd.

Regarding the first point, the PCMB has in previous correspondence expressed concerns about the manner in which the Coastal Plain Oil and Gas Leasing Program EIS was finalized. The short timelines and lack of consultation with Canadian indigenous communities related to the Marsh Creek East seismic exploration program once again points to a lack of sensitivity for international cooperation in managing effects to the Porcupine Caribou herd.

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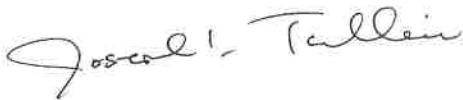


Regarding the second point, the PCMB is concerned about the likelihood that timing of proposed project activities would interfere with use of the area by the Porcupine Caribou herd. The documents outlining planned operations note that activities would end approximately May 31, 2021. This is of grave concern because the Porcupine Caribou herd migrates to the Coastal Plain to calve each spring. Historical data collected by biologists on the Porcupine Caribou Technical Committee (PCTC) indicate that Porcupine Caribou have arrived near the program area as early as May 11. Large numbers of caribou have historically arrived in the program area by May 20, and very large numbers have been noted by May 26 in many years. Since calving is an extremely sensitive time and the success of calving is vitally important for the productivity of the herd, the schedule should be altered to ensure that all activities have been completed by May 15 in order to minimize disturbance of caribou during calving.

Additionally, the PCMB noted that summer cleanup and inspections are planned to take place in July and August of 2021 and that over the course of 15 days during this period there could be 450 to 600 helicopter landings and take-offs. Porcupine Caribou are consistently present in this area during the first three weeks of July. Therefore, the helicopter activity planned for cleanup and inspections would definitely have a disturbing effect on portions of the Porcupine Caribou herd. Cleanup and inspections should be delayed until August or until it has been confirmed that caribou are not present. Given the availability of satellite collar information, program operators should work closely with the PCTC to avoid any disturbance of Porcupine Caribou.

The Coastal Plain of the Arctic National Wildlife Refuge is a critical part of Porcupine Caribou ecology. To preserve the essential nurturing aspects of this portion of the refuge during calving and post-calving, the PCMB calls upon Alaska's Bureau of Land Management to ensure that appropriate and necessary environmental stewardship principles are implemented. The future health of the Porcupine Caribou herd depends on these management decisions.

Sincerely,



Joe Tetlichi
Chair

