



November 7, 2023

Bureau of Land Management, Alaska State Office

Attn:

222 West 7th Avenue #13

Anchorage, Alaska, USA

99513-7599

Dear: Coastal Planning Leasing Program EIS

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

The Government of Yukon has reviewed the draft Supplemental Environmental Impact Statement (draft SEIS) published in the U.S. Federal Register on September 15, 2023 under NEPA number DOI-BLM-AK-0000-2021-0006-EIS. The draft SEIS is an undertaking by the Bureau of Land Management (BLM) together with the United States Fish and Wildlife Service (USFWS) to implement an oil and gas leasing program on the Coastal Plains of the Arctic National Wildlife Refuge as per PL 115-97. This letter contains the perspectives of the Government of Yukon on various aspects of the proposed program as outlined in the draft SEIS, specifically to our shared transboundary ecological and social values surrounding the Porcupine Caribou Herd. We reiterate the importance of a thorough review for other species of shared concern (e.g., polar bear, species at risk). However, Porcupine Caribou are of paramount importance to our government and as such, we have decided to focus our comments there.

Despite providing detailed feedback meant to improve the SEIS, the Government of Yukon maintains that while our government supports the sustainable development of resources, we do not believe that the development of oil and gas resources within the calving, post-calving, and summer ranges of the Porcupine Caribou Herd (PCH) are sustainable. We acknowledge that PL 115-97 does not allow BLM to select a no development alternative (i.e., Alternative A); however, the Government of Yukon continues to oppose the development of oil and gas resources in areas that are critical to the long-term viability of the PCH, including those areas in the Arctic National Wildlife Refuge. As a result, we do not provide feedback on which Alternative is supported by our government but we do attempt to provide critical feedback to help the BLM and USFWS improve the draft SEIS, which contains critical flaws.

Below you will find comments organized in two sections: environmental effects on the PCH, which details feedback and recommendations with respect to how the herd's needs are addressed in the draft

SEIS and how project impact analysis are completed; and, the socio-economic effects of the project on subsistence harvest, food security, and human health in relation to Porcupine Caribou.

Vulnerability of the Porcupine Caribou Herd to oil and gas leasing in the Coastal Plain

The Government of Yukon and its partners commissioned the Russell and Gunn (2019) report to evaluate the vulnerability and risk of draft SEIS alternatives, and to understand the consequences of the oil and gas leasing program through time. That report clearly showed that the herd was projected to decline faster and grow slower under any proposed alternatives. That work showed that climate effects were likely the predominant factor governing the PCH. However, the key vulnerability demonstrated by that work was that population increases would diminish, and during periods of average or poor climate conditions, the herd's potential to decline and magnitude of those declines would be greater. In effect, the herd would not grow to its potential and would be at a greater risk of decline. The PCH is known to grow and decline slowly (e.g., 3.7% annual growth rate; Caikoski 2018). As a result, its ability to recover through high growth rates is unrealistic. This is concerning when we consider the consequence of a decline caused by habitat alterations as a result of the oil and gas leasing program. A shift in population demographics could result in the population losing more animals in a decline than can be made up in a growth phase, resulting in both a reduced herd size and lost opportunities for subsistence users. Either of these outcomes would result in the Arctic National Wildlife Refuge failing to meet three of its primary purposes: 1) considering wildlife diversity, 2) fulfilling international treaty obligations, and 3) maintaining subsistence opportunities. The outcome would also lead to a failure of 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, by failing to meet subsistence opportunities.

Environmental effects on the Porcupine Caribou Herd

Frequency of Use Mapping and Application to the Selection of Conservation Areas for PCH

Frequency of use data layers were provided by our government in 2017 to the BLM in preparation of the EIS. This data forms the basis of areas not available for leasing in the EIS and draft SEIS and as such, we wish to ensure the data is being applied appropriately. We believe we are best positioned to critique this data since Government of Yukon staff created the data layers through analysis they conducted. While we believe the application of data layers describing the frequency of use of habitats by the PCH during calving, post-calving and summer (or other seasons) is warranted and useful in describing critical habitats used by the herd, we do believe there are significant flaws in its application. Below, we provide clarity on how these data layers could best form the basis of conservation areas in the SEIS for PCH.

- Files should be updated to include data from 2016 to present. While we do not believe this will result in significant changes in the periods used within the draft SEIS, we do believe it is best practice to incorporate up-to-date results of analysis when and where possible. Our government

will work with the drafters to provide the data layers and incorporate them into the final SEIS (in a way that we believe is appropriate).

- We recommend that data be displayed in a way that shows the relatively continuous nature of the data as opposed to the 20, 30 and 40% thresholds initially included in the *Sensitive Habitat's of the Porcupine Caribou* document (PCTC 1993). We believe this provides a more realistic view of how the herd uses the area. We would be happy to provide example legends and approaches based on our experience using this dataset.
- The selection of the 40% threshold for calving is arbitrary. The 20, 30 and 40% thresholds were applied in the original *Sensitive Habitats of the Porcupine Caribou* (PCTC 1993) and were used simply for display of the data. At present there is no rationale for why 40% was used as opposed to 30%, or perhaps 27% or any other value. An example of an objective approach would be to simply look at the ratio of area to frequency of use to seek natural inflections in the data. This approach would ensure an objective approach that would also efficiently identify the area used in most years by the herd (but see our last point below on use of this dataset). Other objective approaches for choosing a data threshold could also be used, provided they result in an outcome consistent with the intent of protecting the calving and post-calving areas.
- The 95% kernels used to generate the frequency overlap polygons describe the actual area used by the herd and do not take into account the need for effective habitat at the margins of each range to be considered. The draft SEIS acknowledges that sound, light and other disturbances can affect use of habitat beyond the actual footprint of a disturbance through a zone of influence (ZOI), however this concept is not applied when the boundaries of each Alternative is considered. To do so, a ZOI should be identified and buffered against the actual selected frequency threshold to ensure all available habitats are used by the PCH. The draft SEIS acknowledges this is required, although it references that a similar ZOI as that observed in the existing oil fields would be adequate. However, the distance identified in the draft SEIS is flawed for a number of reasons, and is not applied to the selected frequency threshold when defining critical calving or post-calving areas.

The most current analyses in the area should be considered as a starting point, but is currently not referenced in the draft SEIS. Johnson et al. (2020) analyzed Central Arctic caribou data and found that the herd avoided infrastructure and/or activities by 5 km during calving, 2 km during post-calving, and 1 km during insect harassment periods. We note that Johnson et al. had a very limited sample period (i.e., two years) and that different ZOIs may have been measured in other years should the study have continued to measure the ZOI in more years. For example, Boulanger et al. (2021) found avoidance distances of barren-ground caribou from mining activity in the adjacent Bathurst herd ranged between 6.1 and 18.7 km, varying significantly between years and dependent on habitat selection by the herd relative to infrastructure. Evidence is strong that ZOI's often extend far beyond the cited 4 km threshold in Alaska's oil fields.

The draft SEIS and previous iterations have identified that harvesting will be allowed in the program area (see F-34). Ample evidence in the literature from multiple systems has also made clear that the ZOI of a project's infrastructure is increased when harvesting is permitted from that infrastructure. For example, Plante et al., (2018) found the ZOI increased in areas once hunting started as compared to before hunting activities. Since hunting will be allowed within the proposed development scenarios outlined in the draft SEIS, any buffer applied to the selected frequency threshold must also consider that the ZOI of infrastructure will be larger due to hunting activities.

Finally, with respect to the ZOI, it is important to note that PCH are naïve to industrial disturbance and are expected to respond more strongly and negatively than the Central Arctic Herd (CAH), where most mitigations are borrowed (DSEIS 3-208). This effect will occur on the herd's most sensitive ranges (PCTC 1993); the herd has limited habitats to select from if displaced from these habitats; and the herd has relatively low levels of productivity if impacted based on historic rates of increase (Caikoski 2018). When considered with the points made above by Johnson et al., (2020), Boulanger et al., (2021), and Plante et al., (2018), together with the many other references that could be added here, it is clear that simply selecting a frequency threshold arbitrarily and not accounting for a ZOI from disturbances that could occur immediately adjacent to the boundary of the protected areas, is not sufficient to protect the herd's most critical ranges. Given the results of Russell and Gunn (2019) that clearly outline the heightened risk of development in this area for PCH, residual impacts will be too significant if the above steps are not implemented, and even if implemented, may still result in significant residual impacts as we are largely unaware of how this will affect the herd. To date, the evidence referenced above is the only evidence we are aware of that has been developed specifically for the PCH and the proposed oil and gas leasing program. The evidence must be applied throughout the SEIS to ensure any planned activities are science based and conservation oriented. Not doing so will result in the BLM and USFWS failing to meet the goals of the Arctic National Wildlife Refuge.

- Griffith et al., (2001) describes that the PCH use the best available habitat pending environmental conditions. Severson et al., (2021) conducted analysis evaluating this relationship and agreed, showing that future climate scenarios suggest a much greater use of habitats that are found in the oil and gas leasing program boundary during calving and post-calving. Interannual variability in habitat use is a hallmark of migratory caribou and selection of precise areas during calving with subsequent movements in the post-calving periods is well known. The application of the frequency data layers and understanding of the herd's calving and post-calving ranges must be interpreted in this manner. The selection of specific frequency thresholds is useful for identifying the area most important to the herd on average. However, this selection (e.g., using the 40% contour) does not account for habitats that may play critical roles in areas that are used more rarely at this time. The identification of future projected calving and post-calving areas in Alternative D is an excellent start towards this goal and will assist in addressing current day issues caused by the inter-annual variability that is sometimes noted in the herd's calving and post-calving areas. Alternative B and C do not address these issues. Planning must account for the presence of the herd anywhere the herd could arrive during critical periods, even

if the frequency of use is very low (e.g., 5% of years) and to account for future plausible scenarios. The Government of Yukon considers that habitat used by the herd during calving and post-calving in any year is critical to the herd's success.

- Once an appropriate frequency threshold with adequate ZOI buffer is chosen, all maps and tables, including the areas identified to protect PCH calving and/or post-calving in Alternatives C and D, and Appendix E, should be updated to reflect the new objective and supported boundary of choice. A clear articulation of the rationale for each step should be provided in addition to how these new layers will be managed as described throughout the draft SEIS.

Other data layers describing PCH use of habitats

Three other data layers used to describe PCH use of the oil and gas leasing program require updating. Updates to data layers that have few years – or do not include the most recent years available – are most critical, as the sample sizes were quite low in the EIS due to when satellite GPS collars were first deployed on the herd:

- Map 3-31 which describes the calving locations of the herd from 1983 to 2018. Calving maps should be available from the Alaska Department of Fish and Game that can show calving distributions from 2019-2023. The herd has calved in or immediately adjacent to the project area in all of those years.
- Map 3-34 which describes movement pathways of collared caribou using Brownian Bridge Movement Models from 2013-2018. This is a very limited dataset and since 2019 we have observed a very different movement during the late post-calving / insect harassment period. This new data could be required to describe herd needs pending which Alternative is ultimately selected.
- Map 3-38 which describes large post-calving aggregations as presented by Russell and Gunn (2019). This was a very limited dataset (4 years) that would have 5 additional years of data to consider. As stated above, movements shifted considerably beginning in 2019 and these analysis would identify new movement patterns not described with this limited data set.

Integration of new knowledge or PCH-specific knowledge into the draft SEIS

Several pertinent and significant new publications have become available respecting the influence of industrial activities on migratory caribou. This includes recent publications on the Porcupine and CAH. The draft SEIS does a good job of incorporating several of these into the text of the main chapter; however, most of this information fails to be considered during impact assessments offered in the document. Specifically:

- The draft SEIS continues to maintain that calving displacement only occurs following the first three weeks following calving. However, Johnson et al. (2020) clearly show through detailed analysis of the CAH that effects are measured out to at least four weeks following calving. This finding speaks to the need to consider not just the calving period but at least the first month of a caribou's life in designing mitigation. Alternative D is the only current Alternative that does this.

- Johnson et al. (2020) demonstrate that a measurable ZOI is present during calving, post-calving and insect harassment periods at distances of 5, 2 and 1 km, respectively. Note that while this paper and distances should be identified in the draft SEIS, we believe, as stated above and acknowledged in the draft SEIS, that these distances are likely conservative for the PCH for the reasons listed above (e.g., naïve to disturbance, hunting, etc.).
- Analysis of CAH relative to traffic levels has also identified that adult female cows respond to much lower traffic volumes than identified in the draft SEIS, as previously identified in the Alaska oil fields. Severson et al. (in press) found caribou habitat selection was highest when traffic volumes were <5 vehicles/hr during the post-calving and insect harassment period, contrary to previous thresholds of 15 vehicles/hr. The draft SEIS should be updated to include these findings, and thresholds altered where appropriate.
- The draft SEIS continues to assert that caribou can habituate to low-level constant noise and oil field activities. However, there is no data available that demonstrates this effect, while Johnson et al. (2020) demonstrates that evidence for habituation is either weak or totally absent in their analysis. Unless evidence is provided, references that caribou habituate to disturbances should be removed from the draft SEIS; Johnson et al. (2020) referenced how caribou do not habituate to these disturbances.
- The draft SEIS does a much better job of describing and implementing some aspects of climate effects on the PCH; however, it could go further by describing mitigations and strategies consistent with the results of recent published scientific studies. For example, the main text of the report does a reasonable job of describing the results of Severson et al. (2021), but the application of the knowledge in the report can be clearer. For example, the draft SEIS fails to provide the magnitude of shift in range use expected under future climate scenarios for the PCH (i.e., 429% increase in suitable calving habitat and a 35% increase in suitable post-calving habitat with comparable declines in the other portions of the herd's ranges).

The impact assessment for PCH is largely subjective and ignores important evidence.

A significant issue with the existing draft SEIS is that sections detailing impacts on PCH are not based on quantitative evidence and appear largely subjective. As risk is a product of probability and consequence, we believe that an explicit linkage to evidence is required. Thankfully, significant bodies of work are available for PCH to ensure an objective and quantitative impact assessment is completed within the draft SEIS. First, we must evaluate probability, which is provided for by understanding the herd's current and past distributions:

- As stated above, the current calving and post-calving ranges are described using the frequency of use data layers provided by our government. We have outlined the flaws in how this data has been used in this assessment. As a first step, updating how this information is displayed, described, and used will help ensure that the current and past distribution of the herd is properly contextualized in the SEIS, ensuring current probabilities of conflict are accurate.
- Next, Severson et al. (2021) provide us with plausible future scenarios based on conservative climate scenarios (i.e., it's possible we could see far greater use of the project area than forecast). Contextually, we see a shift from the east to the west into the project area that is not currently

described in the draft SEIS. This shift amounts to a significant increase in use during the calving period specifically, but also an increase during post-calving. When evaluating a range-wide shift and during the post-calving period, it is worth noting that use of habitats further east declines significantly. Although the area used will not increase as significantly as for the calving period, the importance of this increase is significant. The impact assessment must make this aspect of the probability of conflict explicit and based on evidence.

The second aspect of risk is consequence. Two assessments have evaluated this aspect of the PCH quantitatively: Griffith et al. (2001) and Russell and Gunn (2019). We will focus on the latter as that work builds on Griffith et al. and completes actual quantitative models describing consequences of effects. This latter body of work is the only quantitative body of work that we are aware of that completes a quantitative impacts assessment for PCH of the various alternatives.

- Russell and Gunn (2019) find that the consequences of oil and gas development on the Coastal Plains are significant, regardless of the scenario chosen. While the current Alternatives vary from those available in the original EIS, Alternatives B and C in the draft SEIS are nearly identical to Alternatives proposed in the original.
- Models in Russell and Gunn (2019) contain conservative estimates of the impacts to PCH from the oil and gas leasing program. We will address comments found in the draft SEIS below; however, we'll point out that:
 - The impact of hunting activities within the project area is not included in models. As noted above, the addition of hunting will lead to a significant increase to the ZOI, and thus we can expect a much greater impact, as demonstrated by Griffith et al. (2001) and Russell and Gunn.
 - The relationship between displacement and predation is not accounted for in their models. In effect, the herd is likely to be displaced into suboptimal habitats, leading to decreased herd nutrition and increased predation rates of calves (Griffith et al. 2001). This is not explicit in the models; thus, the impacts are reduced.
 - Climate change scenarios included in the report did not consider future distribution scenarios of the herd. Models developed by Severson et al. (2021) demonstrate a significant increase in the importance of the oil and gas leasing area for PCH. As a result, the probability of effects is greatly increased to the herd. This effect is not quantified in Russell and Gunn, again resulting in under predictions of the effects of the oil and gas leasing program.
- We note that Don Russell and Anne Gunn are, at a global scale, two of the most accomplished and respected caribou biologists, having devoted their lives to studying and modelling caribou behaviour using quantitative data whenever and wherever possible. The main body of the draft SEIS extensively references Russell and Gunn (2019). Unfortunately, the impact assessment dismisses or fails to draw upon the quantitative and objective work presented in the report, despite referencing it throughout the main body of the report. We reiterate that Russell and Gunn (2019) is the only modern impact assessment completed on PCH and should be

considered the authoritative source of information concerning impact assessment for this herd and oil and gas development on the Coastal Plain. To the best of our knowledge, no other objective assessment based on quantitative data is available at this time. While we agree that several assumptions exist in this report, well-described assumptions are common in all models. On the other hand, subjective assessments are inherently based on assumptions that are not explicit or necessarily based in quantitative evidence. The draft SEIS impact assessment is subjective based on our review. We recommend that the impact assessment be rewritten to explicitly reflect the findings of this report and other evidence and objectively draw conclusions supported by this literature.

Specifically, we note that the impact assessment of Alternative B found in the draft SEIS is problematic. An almost exact evaluation of this alternative was completed in the Russell and Gunn, and findings show an increased likelihood of future declines by 17-18%. Further, results from that report that declines would be followed by much slower than expected growth point to an overall loss of resilience to the herd. When combined with the conservative nature of Russell and Gunn's models, we believe that this alternative would fail to meet Purpose 1, 2 and 3 of the Arctic National Wildlife Refuge, and would also likely fail to meet the purposes of 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. At this time, we are unable to evaluate the impacts of alternatives C or D as neither are properly assessed in the draft SEIS. We do believe the impacts of either are significantly less than Alternative B; however, the magnitude of changes and the overall differences remain unknown.

We believe that a robust impact assessment in the SEIS is necessary as it will lead to appropriate decisions on selected alternatives, stipulations, and operational procedures. In fact, the analysis we have available (as described above) leads us to believe a robust impact assessment will show that sustainable development is not possible in this area; however, as PL115-97 does not allow for this outcome, at a minimum, recommendations will be made for the highest standards to reduce harm to the extent possible in meeting NEPA requirements.

Mitigation of effects remains uncertain, and thus we remain uncertain whether impacts can be avoided.

Although significant data has been collected in Alaska with respect to caribou in oil and gas fields, very little of that information has been analyzed or published. Recent publications that have evaluated the effects of oil and gas developments on caribou have found that long-standing mitigations aren't as effective as once thought (e.g., Johnson et al. 2020, Severson et al. in press). Yet what data is available and analyzed is limited to several oil and gas fields and the CAH. Despite the dearth of information on CAH, what is more problematic is that we do not know how appropriate these mitigations will be for PCH. Significant differences between these herds and their habitats call into question whether mitigations (if effective for CAH) will remain so for PCH. Some of these important differences include:

- The sheer size of the PCH relative to the CAH. The former herd is an order of magnitude larger.
- The densities of the PCH that are achieved on the calving ground are five times higher than CAH and during aggregations, the PCH can achieve aggregations in excess of 100K caribou, which are far larger than the CAH population has ever been.
- The ability of the CAH to space away due to the open geography of their habitat as opposed to the constricted Coastal Plains of the PCH.
- The importance of the PCH calving and post-calving grounds within the herd's annual nitrogen uptake is far greater relative to the CAH. Nitrogen uptake is a critical aspect of milk production by parturient cows and reductions in access to nitrogen will result in reduced calf survival.
- Hunting was not permitted within the CAH range where mitigation evaluation occurred, whereas it is allowed within the proposed oil and gas leasing program. As noted throughout this report, hunting from program roads and infrastructure will greatly increase the response caribou have to those features.

As a result of these differences and the limited information available on the effectiveness of mitigation, it is impossible to know whether effects identified in the program can be successfully mitigated. If these effects cannot be mitigated, then impacts will remain adverse, significant and negative for the herd.

Role of the Porcupine Caribou Technical Committee

In our scoping submission, we advised that experts from the Porcupine Caribou Technical Committee (PCTC), experts from the many agencies that are tasked with monitoring and completing research on the herd (including our own government's technical staff and the current Canadian co-chair) be engaged to ensure data was represented objectively and accurately to achieve the best outcome for PCH. Unfortunately, the PCTC was not engaged during the preparation of materials in the draft SEIS, including the numerous areas in the draft SEIS where the PCTC has been provided some regulatory oversight (e.g., within lease stipulations and ROPs) or has been relied upon to complete tasks. While we are supportive of the PCTC being engaged as experts in any program that overlays the herd's range, we wish to ensure that solutions are practical, necessary, and achievable. We are also cognizant of the quantity of work this could entail and its impact on other aspects of Porcupine caribou management, management of other species, and engagement with our communities and partners in Canada and Alaska, since these obligations impact the Government of Yukon's human resources. We request that prior to any regulatory obligation being placed upon the PCTC, direct engagement occurs with the Committee, and agreement is achieved with that body.

We would also recommend that greater consideration be provided on the construction of required monitoring and research programs that would occur as a result of this work. For example, members of the PCTC have been conducting extensive research on the PCH calving, post-calving and summer ranges over the past several years using camera collars to describe activity budget, diet, and insect harassment. They have been undertaking extensive field sampling of vegetation nutrition and trace minerals across these ranges. These data could form the bedrock of any adaptive monitoring program going forward if the work is properly situated within the regulatory framework. Working with the PCTC

will help ensure that occurs in an appropriate manner (e.g., use of a before and after, control impact study, and design of mitigation monitoring research). We continue to point out these major gaps.

Socio-economic effects on subsistence harvest, food security, and human health in relation to Porcupine Caribou

The draft SEIS contains a number of improvements with respect to updated information that may be used to assess socio-economic effects on Canadian user communities of the herd. In addition, the draft SEIS makes clear that the communities of Old Crow, Fort McPherson and Aklavik would “be among the most likely to experience potential indirect impacts due to their proximity to and reliance on the Porcupine Caribou Herd”. We also note that the draft SEIS now includes Canadian harvest data, and although we note the data is presented with some small errors, we appreciate the inclusion of this important addition. We see two places where significant improvements to the draft SEIS could occur:

1. Indigenous governments in Canada have made significant submissions to all stages of the EIS process, including the recent scoping for the draft SEIS, yet we see few references to the significant materials they have included. These submissions provide important context directly from the user communities that are identified as being “among the most likely to experience potential indirect impacts...”, as referenced above. This information is critical to any impact assessment as it ties directly to the probability and consequences of impacts on these communities.
2. Limited analyses are provided to assess the actual socio-economic impacts on Canadian user groups of the herd. For example, in our scoping feedback, the Government of Yukon requested three specific sets of analyses be completed to address impacts to Canadian subsistence users of the herd; however, apart from adding harvest data to the draft, rigorous analyses remain absent or incomplete. Specifically, we requested and continue to request that analyses are completed that:
 - Considers the long-term sustainability of the herd’s population and harvest by all users in scenarios where critical habitat are impacted by development and climate change.
 - Assesses the cumulative effects of oil and gas development, including environmental stochasticity and long-term projections of climate change on subsistence users, including herd size and availability, and implications for harvest management.

The required building blocks to complete this work are in place, specifically the work of Russell and Gunn (2019), Severson et al. (2021), and the Porcupine Caribou Management Board’s Harvest Management Plan (2010). Input from Indigenous governments in Canada provide critical context, assessments of probabilities and consequences. Using these documents and other supporting information, it is possible to provide a review and assessment that considers the impacts on Canadian subsistence users from the

proposed oil and gas leasing program on the Coastal Plain. We recognize that a formal assessment under ANILCA section 810 may not be possible, but we see no reason why a thorough assessment of subsistence impacts is not provided to meet the requirements and intent of 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. As noted in the draft SEIS, Canadian users are the primary users of the Porcupine Caribou herd and are most likely to be significantly impacted by this program.

Despite acknowledging that Gwich'in and Inuvialuit in Canada are most at risk from this program, the draft SEIS fails to adequately assess the impacts on these Indigenous communities. We recommend that the draft SEIS be updated to better assess impacts to these communities by completing the tasks identified above, but also through direct engagement with Canadian communities as appropriate. We recommend that your project team come to Canada and present your materials to the communities that will be primarily impacted by this development. Our government would be happy to work with you to facilitate meetings with communities in the Yukon to ensure their perspectives are heard and understood.

Conclusion

In closing, we would like to reiterate that oil and gas development in the Coastal Plain of the Arctic National Wildlife Refuge risks adverse environmental and socio-economic effects that will be felt beyond the boundaries of Alaska and will extend into the Yukon.

Based on all objective science and traditional knowledge that we have reviewed, our government does not believe the impacts of this program are sustainable and we do not support development of oil and gas resources in the calving, post-calving and early summer habitats of the PCH.

As noted above, Canadian user communities are the primary users of the PCH, and PCH are the primary value for this EIS. While we do not support development of these critical areas, we will continue to offer constructive feedback as possible, and we will continue to make our scientific experts, products, data and reports available to BLM and USFWS to ensure a best outcome for PCH and our communities that is also consistent with your laws.

Please direct correspondence and information updates to Briar Young, Assistant Deputy Minister, Environmental Sustainability, the designated contact for the Leasing EIS process.

Sincerely,



Honourable Nils Clarke
Minister of Environment