

VUNTUT GWITCHIN GOVERNMENT

Government of Vuntut Gwitchin First Nation

CHIEF AND COUNCIL



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October 25, 2019

Nicole Hayes
Attn: Coastal Plain Oil and Gas leasing Program EIS
Bureau of Land Management
222 West 7th Ave., Stop#13
Anchorage, Alaska 99513-7599 USA

Sent via email: blm_ak_coastalplain_EIS@blm.gov, mnhayes@blm.gov

RE: Final Environmental Impact Statement for the Coastal Plain Oil and Gas Leasing Program

Dear Ms. Hayes,

Vuntut Gwitchin Government is deeply concerned with the Final Environmental Impact Statement (Final EIS) for the Coastal Plain Oil and Gas Leasing Program.

In our review of the Final EIS thus far, Vuntut Gwitchin Government does not feel that the Bureau of Land Management (BLM) has adequately or meaningfully addressed the concerns we raised in our letter dated March 14, 2019 on the Draft EIS.

Throughout the Environmental Impact Statement process for the Coastal Plain Oil and Gas Leasing Program, BLM has failed to adequately acknowledge, consult or provide reasonable opportunities for Vuntut Gwitchin First Nation participation; failed to adequately assess cumulative and transboundary impacts to Vuntut Gwitchin First Nation; failed to utilize the Traditional Knowledge of the Vuntut Gwich'in, based on thousands of years of co-existence with the Porcupine caribou; and failed to assess the impacts of oil and gas activity on the Vuntut Gwitchin First Nation subsistence harvest of the Porcupine caribou herd. Vuntut Gwitchin Government presented these deficiencies in the process to date in our letter on the Draft EIS and they have yet to be rectified.

Of the proposed oil and gas leasing programs outlined in the Final EIS, Vuntut Gwitchin First Nation only support Alternative A, No Action. In identifying Alternative B as the preferred leasing scenario, which offers the most land for leasing with the fewest restrictions and protections, BLM completely disregards the critical importance of "Iizhik Gwats'a n Gwandaii Goodlit" to Vuntut Gwitchin First Nation's physical, cultural and spiritual survival.

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At no point did BLM initiate consultation with Vuntut Gwitchin First Nation to acknowledge the thousands of years of Traditional Knowledge we hold or to acknowledge our interests and concerns as a potentially affected subsistence community.

In responses to several of the comments we submitted on the Draft EIS, BLM states the Final EIS has “been revised to more fully analyze transboundary impacts, where applicable” and that “text has been added specifically addressing Canadian sociocultural systems and potential impacts to those systems”. These are substantive changes that should have been addressed in a revised or supplemental EIS to the draft EIS and reissued for public review per our letter dated October 1, 2019. We note that the changes are insufficient to address the issues raised.

Vuntut Gwitchin Government remains concerned that this process lacked the time and resources necessary to be robust and transparent. The aggressive timeline this process followed resulted in an inability to compile adequate baseline information and to undertake the full impact analysis necessary to determine the potential impacts to the Vuntut Gwitchin First Nation, and the Porcupine caribou herd.

Vuntut Gwitchin Government would like to acknowledge that this letter is not indicative of the total extent of our comments and concerns on the Final EIS for the Coastal Plain Oil and Gas Leasing Program but is our formal request that BLM correct the deficiencies of the process to date and acknowledge and engage with the Vuntut Gwitchin First Nation and other potentially impacted Canadian subsistence communities.

Mahsi' choo,

A large, stylized handwritten signature in black ink, starting with a large loop and ending with a long horizontal stroke.

Dana Tizya-Tramm
Chief
Vuntut Gwitchin Government