



**WILDLIFE MANAGEMENT
ADVISORY COUNCIL (NWT)**



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

November 6, 2020

Re: Marsh Creek East Seismic Exploration environmental assessment

Dear Sarah LaMarr,

We write to you today as Chairs of three of the wildlife management bodies for the Inuvialuit Settlement Region, which abuts the Alaska border. Below, we have outlined several major concerns with the current proposal for the Marsh Creek East Seismic Exploration. As the review period was unrealistically short, our Councils have not had the opportunity to review the proposal through a technical lens. Please note that nothing within this submission is to be construed as support for this project by our respective organizations.

Our first major concern is the likelihood of negative effects on the Porcupine Caribou Herd, both the effects of aircraft during key times of the year as well as the seismic activity itself. From decades of VHF and GPS collar data, we know that caribou from this herd arrive to calve in the project area as early as May 11. Calving begins shortly thereafter. The sensitivity of cows and calves to disturbance at this time in their life history is very well documented. Research has also shown that caribou exhibit avoidance behaviour during the calving period up to several kilometers away from oil and gas infrastructure. And, lastly, decades of research have illustrated the importance of access to high quality food sources during the critical calving period.

From an ecological perspective, the proposal of any industrial activity in the calving range of the Porcupine Caribou Herd is absurd. The risk is simply too great. Similarly, the risk to an essential

Inuvialuit food source is unacceptable. The Inuvialuit have depended on this herd for hundreds of years for food, cultural and social well-being. The importance of this caribou herd to the Inuvialuit is reflected in the protections and conservation measure provided under the Inuvialuit Final Agreement and the Porcupine Caribou Management Agreement which the Inuvialuit are signatories to.

Our second major concern is regarding the use of forward-looking infrared (FLIR) sensors in surveying for polar bear dens prior to groundworks. It is our understanding that the FLIR survey data will not be ground-truthed. This leaves us with a lack of confidence in the survey to adequately map where polar bear dens are. Disturbance during the denning period would have greatly adverse impacts on polar bears and their cubs. The polar bear is an important species to Inuvialuit for many reasons, including spiritual, cultural, and as a harvested species. This connection between Inuvialuit and polar bears goes back generations. Inuvialuit remain heavily involved in polar bear conservation efforts.

The Inuvialuit and co-management partners are involved in a number of joint research, management, and conservation efforts for transboundary species, including but not limited to the Porcupine Caribou Herd and Southern Beaufort Sea polar bear subpopulation. Impacts to these species will have cascading impacts on these joint efforts, further endangering our ability to successfully conserve these species, especially in light of ongoing climate change impacts..

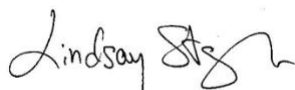
As noted above, the two-week review period for this proposed project makes meaningful technical review impossible. Given the high potential for significant and lasting negative effects to at least two transboundary species with international management agreements in place, this timeline is not just unrealistic: it is an affront to the spirit and intent of those agreements.

Due to the above noted concerns, we request that this proposal be subject to a full Environmental Impact Statement.

Sincerely,



Jim Elias
Chairperson, Inuvialuit Game Council



Lindsay Staples
Chairperson, Wildlife Management Advisory Council (North Slope)

A handwritten signature in black ink, appearing to read 'Lindsay Staples', written in a cursive style.

Larry Carpenter
Chairperson, Wildlife Management Advisory Council (Northwest Territories)