



December 11, 2020

Chad B. Padgett
State Director
Bureau of Land Management (BLM)
Alaska State Office
222 West 7th Avenue, Mailstop 13
Anchorage, AK
99513-7504

Re: Comments for the Coastal Plain Alaska Oil and Gas Lease Sale

Dear Mr. Padgett,

I am writing on behalf of the Gwich'in Tribal Council (GTC), located in the Northwest Territories, Canada, to formally state our opposition to the oil and gas lease sale within the Arctic National Wildlife Refuge (ANWR) in response to the BLM's Call for Nominations.

ANWR is sacred to us as a crucial area of habitat for the Porcupine Caribou during calving and post-calving. As Gwich'in, it is our responsibility to protect the Porcupine Caribou which are vital to our culture and sacred to our people. We have consistently expressed our desire to protect the sacred lands within ANWR for the protection of the environment and preservation of our culture for over three decades now. To that end, we must stand against projects that will have detrimental impacts to the Porcupine Caribou, such as this proposed oil and gas lease sale.

In addition to these impacts, we know that oil and gas exploration will also have long-term, and significant impacts to both tundra and vegetation. The impacts to this area from the seismic activities that occurred in the mid-1980s are still present to this day. The Gwich'in depend on the survival of the Porcupine Caribou for the sustainability of our traditions and culture for future generations. We simply cannot support a project that will cause such generational damage to a critical habitat.

Furthermore, we must express our dissatisfaction with the lease sale process. There has not only been a lack of consideration regarding transboundary implications and cultural values, but the entire process has been rushed and flawed. This is clearly exemplified by the Detailed Statement of Sale coming out before the Call for Nominations period was complete. In not waiting for the completion of the Call for Nominations period and carefully considering all comments received, including those within this letter, the BLM is continuing to attempt to silence our voices despite the duty to consult with the Gwich'in Nation as subsistence users of the Porcupine Caribou. This makes it obvious to

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us that the BLM has no intention of listening to concerned parties and that Indigenous rights are of no consequence in this immoral and illegal process.

Several Indigenous groups and environmental advocacy organizations have consistently defended the protection of ANWR on many fronts, including the ongoing litigation. It is our view that until the lawsuits are resolved, the BLM should not be proceeding with the authorization of any activities on the Coastal Plain of Alaska. Moreover, the United Nations is currently investigating the proposed development as a potential violation of the human rights of the Gwich'in in Alaska and the Yukon and Northwest Territories in Canada.

We do not feel that the BLM has adequately or meaningfully addressed the concerns to our Indigenous and human rights we have raised throughout this process, and therefore should not be proceeding with a lease sale while these concerns remain unaddressed.

In closing, the GTC would like to reiterate that we, the Gwich'in, will not be silenced as we have always and will continue to stand in opposition to the oil and gas lease sale within the Arctic National Wildlife Refuge. We do so in defense of our cultural rights, our human rights, and in solidarity with the Porcupine Caribou who cannot speak for themselves. We urge the Bureau of Land Management to make the morally sound decision and take steps to protect the ANWR from the obvious impacts resulting from this proposed lease sale and associated proposed developments.

In unity with all Gwich'in,

Ken Smith
Grand Chief

cc: Kristine McLeod, GTC Deputy Grand Chief
Les Blake, Tetlit Gwich'in Council President
Chief Wanda Pascal, Teetl'it Gwich'in Band Council
Mavis Clark, Acting Gwichya Gwich'in Council President
Chief Phillip Blake, Tsiigehtchic Charter Community
Chief Robert Charlie, Inuvik Native Band and Acting Nihtat Gwich'in Council President
Michael Greenland, Ehdiitat Gwich'in Council President
Chief Danny Greenland, Aklavik Indian Band
James Thorbourne, GTC Chief Operating Officer
Amber Keegan, GTC Policy, Negotiations, & Communications Specialist