



Mr. Chad Padgett  
State Director  
Bureau of Land Management, Alaska State Office  
222 WEST 7<sup>TH</sup> AVENUE, #13  
ANCHORAGE AK 99513  
[blm\\_akso\\_ak932\\_cpcomments@blm.gov](mailto:blm_akso_ak932_cpcomments@blm.gov)

December 17, 2020

Dear Mr. Padgett:

### **Government of the Northwest Territories' opposition to the Coastal Plain Oil and Gas Lease Sale**

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On behalf of the Government of the Northwest Territories (GNWT), please find enclosed a formal submission in response to the Bureau of Land Management's Alaska Coastal Plain Oil and Gas Lease Sale Call for Nominations and Comments. The GNWT promotes a balanced and sustainable approach to development that supports our goal to manage and conserve wildlife, and protect and provide for the health and well-being of the people of the Northwest Territories (NWT). The GNWT supports responsible and sustainable resource development within the context of appropriate engagement, consultation, assessment and regulation to ensure a balanced approach that also addresses key conservation issues and respects the rights of Indigenous communities. As expressed below, the GNWT understands that the establishment of the Arctic National Wildlife Refuge (ANWR) was itself a measure to balance habitat and calving ground protection needs with those of responsible development. While the GNWT does not support the disruption of this balance by the granting of any leases within the 1002 lands, tracts with the most significant concerns have been identified in our submission.

ANWR was established for the protection and conservation of wildlife, and ANWR remains critically important to the protection of critical calving and post-calving habitat for the Porcupine Caribou herd and polar bear denning areas. Our technical analysis of the lease sale call for nominations was undertaken with this in mind. In the case of Porcupine caribou, ANWR and the 1002 lands in particular are a critical piece in ensuring that caribou conservation is addressed in an overall balanced approach.

Recognizing a great deal of the wildlife across our shared Arctic coast are transboundary, Canada and the United States have a long history of collaborative management and conservation of these shared resources through a number of treaties and agreements.

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The GNWT is party to the Canadian *Porcupine Caribou Management Agreement* and is represented on the *International Porcupine Caribou Board*. As such, the GNWT has a responsibility for the stewardship and conservation of the Porcupine herd and protection of subsistence harvest by Gwich'in and Inuvialuit in the NWT.

These stewardship duties have informed the GNWT's position on the Coastal Plain Oil and Gas Lease Sale. The GNWT does not support the Coastal Plain Oil and Gas Lease Sale proceeding at this time based on inadequate consultation on the Final Environmental Impact Statement (EIS) and the associated Record of Decision (ROD) for the Coastal Plain Oil and Gas Leasing Program, and inadequate time allocated to the lease sale.

#### Inadequate consultation on the Final EIS and ROD

The GNWT maintains that there was inadequate consultation and considerations of impacts to Canadian Indigenous users in the assessment of the Final EIS and the associated ROD for the Coastal Plain Oil and Gas Leasing Program. There has been little evidence that the significant concerns raised by the Gwich'in, Inuvialuit, and GNWT have been considered in those processes, which is deeply concerning. The level of impacts from Alternative B, the selected EIS alternative, to Gwich'in and Inuvialuit in Canada will be significant and unacceptable.

#### Inadequate time for the Bureau of Land Management to review comments on the lease sale

The compressed timelines for the lease sale process has limited the ability of reviewers to meaningfully participate in the process. Furthermore, it is unclear how the comments received on the tracts that may be available for lease sale can be adequately considered between the close of the comment period on December 17, 2020 and the December 31, 2020 deadline to submit bids to the BLM or before the bid opening set for January 6, 2021, which was announced on December 9, 2020.

#### GNWT comments on the Coastal Plain Oil and Gas Lease Sale

Despite our concerns, the GNWT recognizes the direction provided in the Tax Cut and Jobs Act (PL 115-97) to conduct two lease sales in the Coastal Plain by 2024. The GNWT's comments on the Coastal Plain Oil and Gas Lease Sale are documented in the attached Nomination and Comment Worksheet.

The GNWT remains committed to cooperatively managing the Porcupine Caribou herd and its habitat within Canada and across its range, in accordance with the formal agreement between Canada and the United States. The GNWT worked collaboratively with the Yukon Government, who is the Canadian lead on scientific monitoring of the Porcupine caribou herd and shares management authority of the Southern Beaufort Sea polar bear subpopulation, to develop our comments.

The GNWT's comments focus on potential impacts to two wildlife species but the GNWT encourages the BLM to also consider potential impacts to all wildlife populations that rely on the ANWR and the underlying purposes of ANWR, which includes the conservation of fish and wildlife populations and habitats in their natural diversity, when selecting tracts of land to be considered for oil and gas development within the Coastal Plain.

Please feel free to contact Dr. Brett Elkin, Assistant Deputy Minister of Operations, Department of Environment and Natural Resources at [brett.elkin@gov.nt.ca](mailto:brett.elkin@gov.nt.ca) or 1-867-767-9055 ext. 53000 if you have any questions about this letter or the attached comments.

Sincerely,



Erin Kelly, Ph.D.  
Deputy Minister  
Environment and Natural Resources

#### Attachments

c. Honourable Caroline Cochrane  
Premier

Honourable Shane Thompson  
Minister, Environment and Natural Resources

Ms. Shaleen Woodward  
Principal Secretary

Mr. Martin Goldney, Secretary to Cabinet/Deputy Minister  
Executive and Indigenous Affairs

Ms. Shawn McCann  
A/Deputy Secretary Indigenous and Intergovernmental Affairs  
Executive and Indigenous Affairs

Dr. Brett Elkin  
Assistant Deputy Minister  
Environment and Natural Resources

Mr. Craig Machtans, Manager  
Environment and Climate Change Canada

Mr. Mike Sutor, North Slope and Migratory Caribou Biologist  
Environment Yukon

Ms. Amber Keegan, Policy, Negotiations, and Communications Specialist  
Gwich'in Tribal Council

Mr. James Thorbourne, Interim Chief Operating Officer  
Gwich'in Tribal Council

Mr. Jozef Carnogursky, Chair  
Gwich'in Renewable Resources Board

Mr. Jim Elias, A/Chair  
Inuvialuit Game Council

Mr. Bob Simpson, Director, Government Affairs  
Inuvialuit Regional Corporation

Ms. Liz Staples, Caribou Coordinator  
Vuntut Gwitchin First Nation

Ms. Alice McCulley  
Tr'ondëk Hwëch'in First Nation

Ms. Josee Tremblay, Lands and Resources Manager  
First Nation of Na-Cho Nyak Dun

Mr. Joe Tetlich, Chair  
Porcupine Caribou Management Board

Hon. François-Philippe Champagne  
Minister of Foreign Affairs

Ms. Kirsten Hillman  
Ambassador of Canada to the United States

## **Email List**

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**Bureau of Land Management Alaska  
Coastal Plain  
Oil and Gas Lease Sale  
Nomination and Comment Worksheet**



**Name:** Dr. Erin Kelly

**Company:** Government of the Northwest Territories

**Address:** P.O. Box 1320, Yellowknife NT X1A 2L9

**Phone Number:** 867-767-9055 ext. 53000

**Email:** [brett\\_elkin@gov.nt.ca](mailto:brett_elkin@gov.nt.ca) on behalf of Dr. Erin Kelly

Tract Number	Comments
All	Please refer to the Government of the Northwest Territories' (GNWT) cover letter, which is attached as a supporting narrative.
All	Lease sales should be deferred until outstanding legal challenges associated with the final Environmental Impact Statement for the Coastal Plain Oil and Gas Leasing Program are resolved. A deferral of the lease sale can be compatible with PL 115-97, which requires two lease sales by 2024, the first of which must occur by the end of 2021.
All	Limit the lease sale to 400,000 acres, which is the minimum size required under PL 115-97.
All	<a href="#">The Notice of Sale</a> stated that 92% of the Arctic National Wildlife Refuge (ANWR) remains completely off-limits to development. While the 1002 land is approximately 8% of ANWR, this statement is misleading as it does not identify the unique nature of the 1002 land portion that is critical to the Porcupine caribou and for polar bear denning habitat.
All	Please see the supporting narrative on methodology explaining how GNWT, working in collaboration with the Yukon Government, which is the Canadian lead for scientific monitoring of the porcupine caribou herd, evaluated tracts with respect to Porcupine caribou and polar bears.
All	The GNWT appreciates that the Bureau of Land Management reconsidered the requirement to submit comments by mail only and now accepts submissions via email.

Mail to:  
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For more information or assistance with submitting a nomination or comment, please contact Energy & Minerals Branch Chief Wayne Svejnoha, at 907-271-4407.



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Tract Number	Comments
1	Do not offer for lease. Tract 1 is the tract ranked highest in terms of frequency of use by the Porcupine caribou herd (PCH) and oil and gas activities in this area will likely result in significant impacts. Tract 1 is used by the herd almost every year for calving (portions are used 81% of the 37 years on record) and post-calving (portions are used 91% of the 22 years on record). Tract 1 is almost always the first area used by the PCH herd as they migrate into 1002 lands and activities in the area could alter the migration path. The herd also makes significant use of Tract 1 in early summer (July 1-15) and Tract 1 sees the highest use in mid-summer (July 16-August 7). Again, this is one of the <b>most</b> important tracts for the PCH. As for polar bears, while the entire tract is farther than 15.7 km from the coast and no historic dens have been recorded in Tract 1, this tract contains potential polar bear denning habitat.
2	Do not offer for lease. Tract 2 ranks second highest for use by Porcupine caribou and oil and gas activities in Tract 2 will likely result in significant impacts. Tract 2 is used significantly for calving (May 26-June 10) and post-calving (June 11-30) on an almost annual basis. The tract is also significant for migration movements as caribou move into and out of the remaining tracts; often the first caribou to arrive in spring arrive in Tract 2, which is significant as leaders will help determine where the herd calves for the year. Impacts on these animals from development in Tract 2 can be disproportionate. The herd also makes significant use of Tract 2 in early summer (July 1-15) and along with Tract 3 sees the highest use in mid-summer (July 16-August 7). For polar bear impacts, while Tract 2 is all farther than 15.7 km from the coast, Tract 2 has reported polar bear den sites and a higher quantity of potential denning habitat.

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Tract Number	Comments
3	Do not offer for lease. Tract 3 ranks third highest for use by Porcupine caribou and oil and gas activities in Tract 3 will likely result in significant impacts. Tract 3 is used significantly for calving (May 26-June 10) and post-calving (June 11-30) on an almost annual basis. The tract is also significant for migration movements which pass through as caribou move into and out of the remaining tracts; often the first caribou to arrive in spring arrive in this tract which is significant as leaders help determine where the herd calves for the year. Impacts on these animals from development in Tract 3 can be disproportionate. The herd also makes significant use of this tract in early summer (July 1-15), which along with Tract 2 sees the highest use in mid-summer (July 16-August 7). As for polar bears, while there is potential polar bear denning habitat in Tract 3, the entire tract is farther than 15.7 km from the coast and no historic dens have been recorded in Tract 3.
4	Do not offer for lease. Tract 4 ranks fourth highest for use by Porcupine caribou and oil and gas activities in Tract 4 will likely result in significant impacts. Tract 4 is used significantly for calving (May 26-June 10) on an almost annual basis and post-calving (June 11-30) between every year and every other year on average. The tract is also significant for migration movements which pass through as caribou move into and out of the remaining tracts. The herd also makes significant use of this tract on average every fourth year during the early summer period (July 1-15), which sees similar use during the mid-summer period (July 16-August 7). As for polar bears, while the entire tract is farther than 15.7 km from the coast and no historic dens have been recorded in Tract 4, there is potential polar bear denning habitat identified in Tract 4.

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Tract Number	Comments
5	Do not offer for lease. Tract 5 ranks sixth highest for use by Porcupine caribou and oil and gas activities in Tract 5 will likely result in significant impacts. Tract 5 is used significantly for calving (May 26-June 10) and post-calving (June 11-30) between every year and every other year on average. The tract is also significant for migration movements which pass through here as caribou move into and out of the remaining tracts; often the first caribou to arrive in spring arrive in this tract which is significant as leaders will help determine where the herd calves for the year. The herd also makes significant use of this tract on average every fifth year during the early summer period (July 1-15) and sees slightly less use than this during the mid-summer period (July 16-August 7). As for polar bears, while the entire tract is all farther than 15.7 km from the coast and no historic dens have been recorded in Tract 5, there is potential polar bear denning habitat in Tract 5.
6	Do not offer for lease. Tract 6 is needed by the Porcupine caribou to meet their life requirements and ranks twelfth highest in frequency of use. Tract 6 is used significantly for calving (May 26-June 10) and post-calving (June 11-30) between every second to third year. The tract is also significant for migration movements which pass through here as caribou move into and out of the remaining tracts; often the first caribou to arrive in spring arrive in this tract which is significant as leaders will help determine where the herd calves for the year. The herd makes use of this tract a little less than every fifth year during the early summer period (July 1-15) and sees slightly less use than this during the mid-summer period (July 16-August 7). As for polar bears, Tract 6 is farther than 15.7 km from the coast but it contains a higher potential for polar bear denning habitat, some of which have been used previously by polar bears to den in.

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Tract Number	Comments
7	Do not offer for lease. Tract 7 is needed by the Porcupine caribou to meet their life requirements and ranks fourteenth highest in frequency of use. Tract 7 is used significantly for calving (May 26-June 10), on average every other year, and post-calving (June 11-30) every fourth year with some portions being used every other year. The herd makes more use of this tract in summer with it frequenting the tract every third year in the early summer period (July 1-15) and sees slightly less use than this during the mid-summer period (July 16-August 7). This tract is all within 15.7 km of the coast and while it has less polar bear habitat than some other tracts, it has been used previously by polar bears to den in.
8	Do not offer for lease. Tract 8 ranks tenth highest in frequency of use by Porcupine caribou and oil and gas activities in Tract 8 will likely result in significant impacts. Tract 8 is used significantly for calving (May 26-June 10) with some portions used three out of four years, while post-calving (June 11-30) occurs every fourth year with some portions being used every other year or more. The herd makes more use of this tract in summer, frequenting the tract every third year in the early summer period (July 1-15) and sees slightly less use than this during the mid-summer period (July 16-August 7). Approximately 3/4 of Tract 8 is within 15.7 km of the coast. Tract 8 contains potential denning habitat and has been used by polar bears to den in previously.
9	Do not offer for lease. Tract 9 ranks eighth highest for use by Porcupine caribou and oil and gas activities in Tract 9 will likely result in significant impacts. Tract 9 is used significantly for calving (May 26-June 10) with some portions used three out of four years, while post-calving (June 11-30) use occurs every fourth year with some portions being used every other year or more. The herd makes more use of this tract in summer with it frequenting the tract every third year in the early summer period (July 1-15) and sees slightly less use than this during the mid-summer period (July 16-August 7). While only about half of Tract 9 is within 15.7 km of the coast, there is potential denning habitat identified and this tract has been used slightly more than average by polar bears to den in previously.

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Tract Number	Comments
10	Do not offer for lease. Tract 10 ranks sixth highest for use by Porcupine caribou and oil and gas activities in Tract 10 will likely result in significant impacts. Tract 10 is used significantly for calving (May 26-June 10) with some portions used three out of four years, while post-calving (June 11-30) occurs every fourth year with some portions being used every other year or more. The herd makes more use of this tract in summer with it frequenting the tract every third year in the early summer period (July 1-15) and sees slightly less use than this during the mid-summer period (July 16-August 7). While Tract 10 has no historical den locations identified and only about 20% of the tract is within 15.7 km of the coast, it has more than average potential polar bears denning habitat.
11	Do not offer for lease. Tract 11 ranks fifth highest for use by Porcupine caribou and oil and gas activities in Tract 11 will likely result in significant impacts. Tract 11 is used significantly for calving (May 26-June 10) with most portions used three out of four years, while post-calving (June 11-30) use occurs every other year. The herd makes use of this tract every fourth year in the early summer period (July 1-15) and sees slightly less use than this during the mid-summer period (July 16-August 7). During migration to calving areas, this tract lies on the edge of the main migratory pathway. As for polar bears, the entire tract is all farther than 15.7 km from the coast and no historic dens have been recorded in Tract 11 but this tract has a relatively high proportion of potential polar bear denning habitat.

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Tract Number	Comments
12	Do not offer for lease. Tract 12 ranks ninth highest for use by Porcupine caribou and oil and gas activities in Tract 12 will likely result in significant impacts. Tract 12 is used significantly for calving (May 26-June 10) with some portions used three out of four years while on average it is used every other year. Post-calving (June 11-30) occurs every other year. The herd makes more use of this tract in summer every fifth year in the early summer period (July 1-15) and sees slightly less use than this during the mid-summer period (July 16-August 7). In some years, the main migratory movement to calving areas occurs directly through this tract. As for polar bears, the entire tract is all farther than 15.7 km from the coast and no historic dens have been recorded in Tract 12 but this tract contains potential polar bear denning habitat.
13	Tract 13 is needed by the Porcupine caribou to meet their life requirements. Tract 13 is used significantly for calving (May 26-June 10) and post-calving (June 11-30) with use during these periods occurring on average greater than every third year, approaching every other year in portions. The herd makes use of these habitats in both the early summer period (July 1-15) and mid-summer period (July 16-August 7), although far less frequently than in other tracts. During the spring migration to calving grounds, this tract is nearing the terminus of the main migratory pathway for the herd. As for polar bears, while only about 1/3 of the tract is within 15.7 km of the coast and it has less than average potential polar bear denning habitat, there are polar bear denning locations in Tract 13 reported in previous years.

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Tract Number	Comments
14	Tract 14 is needed by the Porcupine caribou to meet their life requirements. Portions of Tract 14 are used for calving (May 26-June 10) as frequently as every three to four years. This area sees frequent use during the post-calving (June 11-30) period with use averaging every third year. The herd makes use of these habitats in both the early summer period (July 1-15) and mid-summer period (July 16-August 7) relatively equally and is present every tenth year. During the spring migration to calving grounds, this tract is nearing the terminus of the main migratory pathway for the herd. As for polar bears, about 40% of Tract 14 is within 15.7 km of the coast, has higher than average potential polar bear denning habitat and has had historic dens documented in its bounds.
15	Tract 15 tract is needed by the Porcupine caribou to meet their life requirements. Portions of Tract 15 are used for calving (May 26-June 10) as frequently as every four to five years. Post-calving (June 11-30) use averages every third year but is more frequent in portions of the tract. The herd makes use of early summer habitats (July 1-15) up to every fifth year while frequency of use declines slightly over the mid-summer period (July 16-August 7). During the spring migration to calving grounds, this tract is nearing the terminus of the main migratory pathway for the herd. As for polar bears, while there are no historic recorded dens and almost all of it is farther than 15.7 km from the coast, it has more than average amounts of potential polar bear denning habitat.

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Tract Number	Comments
16	Tract 16 is used by the Porcupine caribou between calving (May 26-June 10) and mid-summer (June 11-30). Use is primarily focused on the post-calving period (June 11-30) and early summer (July 1-15) period when the herd occasionally aggregates this far west. Use during post-calving may be as frequent as every third year in portions of the tract. As for polar bears, while there are no historic recorded dens and all of Tract 15 is farther than 15.7 km from the coast, this tract has more than average amounts of potential polar bear denning habitat.
17	Tract 17 is used by the Porcupine caribou between calving (May 26-June 10) and mid-summer (June 11-30), however use is generally light. As for polar bears, while Tract 17 is all farther than 15.7 km from the coast, it has higher than average potential denning habitat and has had previous documented polar bear denning in it.
18	Do not offer for lease. Tract 18 is needed by the Porcupine caribou to meet their life requirements. Tract 18 is used significantly for calving (May 26-June 10) with use during this period occurring on average just less than every other year while some portions of the tract may be used in every two out of three years. Post-calving (June 11-30) activities occurs in this tract every fourth year but portions are used as frequently as every third year. The herd makes frequent use (every third year) of portions of this tract for the early summer period (July 1-15). Mid-summer period (July 16-August 7) frequency of use is in every fourth year with some portions as high as every third year, while use in mid-summer declines to approximately every seventh year. In some years, the main migratory movement to calving areas occurs on the south edge of this tract. As for polar bears, there is no historic denning within Tract 18 but 38% of Tract 18 is within 15.7 km from the coast and it has higher than average potential denning habitat.

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**Email:** brett\_elkin@gov.nt.ca on behalf of Dr. Erin Kelly

Tract Number	Comments
19	Do not offer for lease. Tract 19 is needed by the Porcupine caribou to meet their life requirements. Tract 19 is used significantly for calving (May 26-June 10) with use during this period occurring on average just less than every other year while some portions of the tract may be used in every two out of three years. Post-calving (June 11-30) activities occurs in this tract every fourth year but portions are used as frequently as every third year. The herd makes frequent use (every third year) of portions of Tract 19 for the early summer period (July 1-15). Mid-summer period (July 16-August 7) frequency of use is every fourth year with some portions as high as every third year while use in mid-summer declines to approximately every seventh year. In some years the main migratory movement to calving areas occurs on the south edge of Tract 19. As for polar bears, Tract 19 is only about 50% within 15.7 km of the coast and has limited potential polar bear denning habitat available but there has had documented historic denning within its bounds.
20	Do not offer for lease. Tract 20 is needed by the Porcupine caribou to meet their life requirements and ranks twelfth highest in frequency of use. Tract 20 is used significantly for calving (May 26-June 10) with use during this period occurring on average just less than every other year while some portions of the tract may be used in every two out of three years. Post-calving (June 11-30) activities occurs in this tract every third year but portions are used as frequently as every other year. The herd makes frequent use (every third year) of portions of Tract 20 for the early summer period (July 1-15). Mid-summer period (July 16-August 7) frequency of use is every fourth year with some portions as high as every third year while use in mid-summer declines to approximately every seventh year. In some years, the main migratory movement to calving areas occurs on the south edge of Tract 20. As for polar bears, there are no documented historic dens in the area but about 60% of Tract 20 is within 15.7 km of the coast and there is some potential polar bear denning habitat identified in the tract.

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**Bureau of Land Management Alaska  
Coastal Plain  
Oil and Gas Lease Sale  
Nomination and Comment Worksheet**



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Tract Number	Comments
21	Do not offer for lease. Tract 21 is needed by the Porcupine caribou to meet their life requirements and ranks eleventh highest in frequency of use. Tract 21 is used significantly for calving (May 26-June 10) with use during this period occurring on average just less than every other year while some portions of Tract 21 may be used in every two out of three years. Post-calving (June 11-30) activities occurs in this tract every fourth year but portions are used as frequently as every third year. The herd makes frequent use (every third year) of portions of this tract for the early summer period (July 1-15). Mid-summer period (July 16-August 7) frequency of use is every fourth year with some portions as high as every third while use in mid-summer declines to approximately every seventh year. In some years, the main migratory movement to calving areas occurs on the south edge of Tract 21. As for polar bears, while the identified potential polar bear habitat in Tract 21 is below average about 50% of Tract 21 is within 15.7 km of the coast and there have been dens documents within its bounds.
22	Do not offer for lease. Tract 22 is almost entirely within 15.7 km of the coast, has a high proportion of potential polar bear denning habitat and, along with Tract 30, is tied for the tract with the second most denning locations. Locations are concentrated in the northern half of the tract but denning habitat occurs throughout. As such, Tract 22 is particularly significant for land denning polar bears. For caribou, Tract 22 is needed by the Porcupine caribou to meet their life requirements. Tract 22 is used significantly for calving (May 26-June 10) with use during this period occurring on average every third year while some portions of Tract 22 may be used every other year. Post-calving (June 11-30) activities occurs in Tract 22 every third year but portions are used as frequently as every other year. The herd is present in Tract 22 every fifth year on average during the early summer period (July 1-15) while mid-summer period (July 16-August 7) use occurs but is less common. In some years, the main migratory movement to calving areas occurs on the south edge of Tract 22.

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Tract Number	Comments
23	Do not offer for lease. Tract 23 shows the highest potential for impacts to polar bears based on quantity of potential denning habitat, numbers of historic dens and proximity to sea ice. The locations of historic dens are spread throughout the tract. As such Tract 23 is particularly significant for land denning polar bears. Tract 23 is needed by the Porcupine caribou to meet their life requirements. Tract 23 is used significantly for calving (May 26-June 10) with use during this period occurring on average every fourth year while some portions of the tract may be used every third year. Post-calving (June 11-30) activities occur at least every third year in this tract. The herd makes use of these habitats in both the early summer period (July 1-15) and mid-summer period (July 16-August 7), although far less frequently than in other tracts.
24	Do not offer for lease. Over 90% of Tract 24 is within 15.7 km of the coast, has a higher than average proportion of potential polar bear denning habitat and has seen historic dens documented in its bounds. For caribou, Tract 24 is needed by the Porcupine caribou to meet their life requirements. Portions of Tract 24 are used for calving (May 26-June 10) as frequently as every three to four years. This area sees frequent use during the post-calving (June 11-30) period with use averaging between every second and third year. The herd makes use of these habitats in both the early summer period (July 1-15) and mid-summer period (July 16-August 7), although far less frequently than in other tracts.
25	Tract 25 is needed by the Porcupine caribou to meet their life requirements. Portions of Tract 25 are used for calving (May 26-June 10) although not as frequently as areas further south or southeast. Tract 25 sees significant frequent use during the post-calving (June 11-30) period with use averaging between every second and third year. The herd makes use of these habitats in both the early summer period (July 1-15) and mid-summer period (July 16-August 7) although far less frequently than in other tracts. As for polar bears, Tract 25 had no documented polar bear dens, but it is all within 15.7 km of the coast and has lower potential polar bear denning habitat.

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Tract Number	Comments
26	Tract 26 is needed by the Porcupine caribou to meet their life requirements. Portions of Tract 26 are used for calving (May 26-June 10) although not as frequently as areas further south or southeast. Tract 26 sees significantly frequent use during the post-calving (June 11-30) period with use averaging between every third and fourth year. The herd makes use of these habitats in both the early summer period (July 1-15) and mid-summer period (July 16-August 7), although far less frequently than in other tracts. As for polar bears, Tract 26 has no documented historic bear dens but about a quarter of Tract 26 is within 15.7 km of the coast and it has a moderate proportion of potential polar bear denning habitat.
27	Tract 27 is used by the Porcupine caribou between calving (May 26-June 10) and mid-summer (June 11-30), however use is primarily focused on the post-calving period (June 11-30) and early summer (July 1-15) period when the herd occasionally aggregates this far west. As for polar bears, while only about 15% of Tract 27 is within 15.7 km of the coast and there are lower proportions of potential polar bear denning habitat, dens have been documented in this tract.
28	Do not offer for lease. While the proportion of potential polar bear denning habitat is not as high in Tract 28 as in some other tracts, it is all close to the coast and along with Track 29 has the fourth most denning locations previously identified in the leasing area. As such, Tract 28 is particularly significant for land denning polar bears. For caribou, Tract 28 is needed by the Porcupine caribou to meet their life requirements. Tract 28 is used every third to every other year for calving (May 26-June 10) and during post-calving (June 11-30) and early summer (July 1-15) it may be used as frequently as between every fifth and third year. By mid-summer the herd will occasionally use habitats in this tract.

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Tract Number	Comments
29	Do not offer for lease. While the proportion of potential polar bear denning habitat is not as high in Tract 29 as in some other tracts, 82% of the tract is close to the coast and Tract 29 along with Track 28 has the fourth most denning locations previously identified in the potential leasing area. As such, Tract 29 is particularly significant for land denning polar bears. For caribou, Tract 29 is used by the Porcupine caribou between calving (May 26-June 10) and mid-summer (June 11-30), however use is primarily focused on the early summer (July 1-15) period and use is less frequent than areas to the east.
30	Do not offer for lease. Tract 30 is tied for the second most polar bear denning locations previously identified in the potential leasing area, has identified potential polar bear denning habitat and is all within 15.7 km of the coast. As such Tract 30 is particularly significant for land denning polar bears. For caribou, Tract 30 is used by the Porcupine caribou between calving (May 26-June 10) and mid-summer (June 11-30). Use is primarily focused on the post-calving period (June 11-30) and early summer (July 1-15) period when the herd occasionally aggregates this far west. Use during post-calving may be as frequent as every third year in the southeast corner while Tract 30 as a whole is frequented every fourth year on average.
31	Do not offer for lease. Tract 31 is used by the Porcupine caribou between calving (May 26-June 10) and mid-summer (June 11-30), however use is primarily focused on the post-calving period (June 11-30) and early summer (July 1-15) period when the herd occasionally aggregates this far west. Use during post-calving may be as frequent as every fourth year. As for polar bears. Tract 31 is mostly within 15.7 km of the coast, has significant quantities of potential polar bear habitat and has been used for polar bear denning previously.
32	Porcupine caribou use habitats adjacent to this tract frequently from calving through mid-summer. As for polar bears, Tract 32 contains coastal areas including sea ice habitat. Potential polar bear denning habitat occurs in this tract and known dens have been documented in habitats immediately adjacent to this tract.

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