



December 16, 2020

Chad B. Padgett
State Director
Bureau of Land Management, Alaska State Office
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Dear Mr. Padgett:

**Re Arctic National Wildlife Refuge Coastal Plain Oil and Gas Lease Sale
Call for Nominations**

As mentioned in our previous correspondence with Alaska's Bureau of Land Management, the Porcupine Caribou Management Board has serious concerns about the manner in which the Coastal Plain Oil and Gas Leasing Program is being finalized. The short timelines and the lack of consultation with impacted Canadian indigenous communities show a lack of consideration for meaningful input and insensitivity for international cooperation in managing impacts to the Porcupine Caribou herd.

While we submit the following comments regarding the nominations of specific tracts on the Coastal Plain, these comments should by no means be taken as an indication of approval for the process or for any subsequent oil and gas-related activities that may take place after a lease sale.

Our comments are based on 37 years of accumulated scientifically collected data of the Porcupine Caribou herd's annual movements and focus on the most critical period of the herd's life history, which encompasses calving season. These data make it clear that activities in the eastern half of the program area will significantly conflict with caribou ecology during May, June, and likely July. The data tell us that disturbance to caribou is most likely to occur in the southeastern portion of the Call for Nominations program area.

The research and analyses documented in *Vulnerability analysis of the Porcupine Caribou Herd to potential development of the 1002 lands in the Arctic National Wildlife Refuge, Alaska* by Russell and Gunn (2019) predicts that there will be significant negative impacts to Porcupine Caribou if development occurs in the program area. Unimpeded, the Porcupine Caribou herd will migrate to the Coastal Plain to calve each spring. Documented annual migration patterns show that Porcupine Caribou have typically arrived on various tracts in the program area in mid-May. Larger numbers of caribou have historically arrived on various tracts in the program area by May 20, and very large numbers have been noted during the last week of May in many years.

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Calving is an extremely sensitive time for caribou and the success of calving is vitally important for the productivity of the herd. The Coastal Plain provides both a relatively safe place for calves to be born and high-quality forage for maternal caribou. Calves will do better if they are born on the Coastal Plain within the 1002 lands and in the absence of oil and gas development. We are concerned that activities associated with oil and gas development on the Coastal Plain during May and June would be very likely to cause disturbance to calving caribou.

Experience gained from studies of the Central Arctic herd has shown that pregnant cows in the caribou herd have not habituated to oil and gas developments and continue to avoid their historic calving ranges where oil and gas activity is now prevalent. While the Central Arctic herd is a much smaller herd and has other viable options for calving areas, the area represented by the tracts that have been identified in your Call for Nominations constitutes the highest valued calving grounds for the Porcupine Caribou herd. Numerous scientific analyses have shown that oil and gas development in this area would cause significant adverse effects to the herd and its population size. We are not aware of any quantitative analysis that has shown otherwise; therefore, we assert that available scientific evidence shows that negative effects to the Porcupine Caribou herd are extremely high.

Porcupine Caribou are also consistently present in the proposed program area during other portions of their lifecycle, including the critical post-calving period in June and as late as the first three weeks of July. During post-calving, in an effort to escape insect harassment, Porcupine Caribou are known to gather together into tightly packed supergroups of many tens of thousands of caribou. It is unknown how these groups would respond to oil and gas development activities; however, any interference in caribou movements could result in calves being separated from their mothers. As well, industrial disturbance has been shown to reduce the foraging rates of adult caribou, which affects the health of adult animals and calves. Therefore, oil and gas activities planned during critical calving and post-calving periods are very likely to have a disturbing effect on large portions of the Porcupine Caribou herd during other sensitive yet critical periods of their lives.

Using historical Porcupine Caribou calving and post-calving location data, we have categorized the tracts of land according to the likelihood that oil and gas activities would cause disturbance to caribou and indicated which tracts should most urgently be eliminated from the lease sale.

Tracts 1, 2, 3, 4, and 5 and tracts 8, 9, 10, 11, and 12 are the **most urgent** to be eliminated from the lease sale. These tracts are the most frequently used by the largest number of Porcupine Caribou; therefore, activities in these tracts are extremely likely to cause disturbance to calving and post-calving activities. These tracts are often occupied by Porcupine Caribou from calving to mid-summer and are considered part of the core range of the herd.

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Tracts 6, 7 and 18 to 21 are the second most urgent tracts to be eliminated from the lease sale. These are regularly used by a large number of Porcupine Caribou almost as often as the aforementioned tracts; therefore, activities in these tracts are also very likely to cause disturbance to calving.

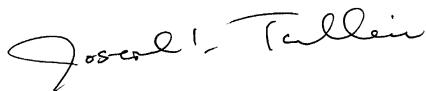
Tracts 13, 14, 22, 23, and 28 are frequently used by a significant number of Porcupine Caribou; therefore, activities in these tracts are likely to cause disturbance to calving. These tracts are the third most urgent tracts to be eliminated from the lease sale.

Historical herd location and movement data show that Porcupine Caribou are likely to be present in **all** tracts during spring; however, the above-mentioned tracts have been prioritized in order of urgency in terms of being the most frequently used by the greatest number of caribou.

The Porcupine Caribou Management Board urges Alaska's Bureau of Land Management to ensure that negative effects on the herd that may result from oil and gas leasing and development are minimized or eliminated by not including the tracts of land that are most critical to Porcupine Caribou in the upcoming lease sale.

Again, we note that this response to the nomination and comment process does not constitute agreement of or support for the proposed activities. We continue to have grave concerns about the lack of consideration given to potential negative impacts to indigenous Canadian user groups, the lack of meaningful consultation with these groups, and the obviously condensed timelines of this process.

Sincerely,



Joe Tetlich
Chair

