



October 4, 2021

Lesli Ellis-Wouters  
Bureau of Land Management  
Attn: Coastal Plain Oil and Gas Leasing Program Supplemental EIS  
222 West 7th Avenue, Stop #13  
Anchorage, AK 99513 USA

Dear Ms. Ellis-Wouters:

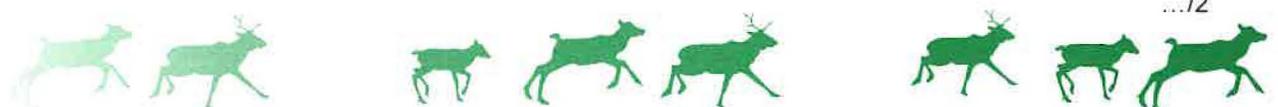
**Re Porcupine Caribou Management Board Comments on Supplemental Environmental Impact Statement re Coastal Plain Oil and Gas Leasing Program**

The Porcupine Caribou Management Board (PCMB) appreciates BLM's willingness to supplement the current Environmental Impact Statement (EIS). PCMB wishes to submit the following comments regarding the Supplemental Environmental Impact Statement (SEIS).

One of the two primary concerns raised by the PCMB during the last comment period was the apparent disregard for the international aspect of managing the Porcupine Caribou herd (PCH). A large portion of the Indigenous users who rely on the herd were ignored by the process simply because they live in the Canadian portion of the PCH's range. While the current EIS acknowledged that there will be potential impacts to Canadian subsistence users, it did not attempt to quantify this impact. Since the traditional harvesting practices and cultural dependence on the PCH by various Canadian Indigenous groups predate the international border, the PCMB notes that these groups were not given adequate consideration. The PCMB would like to see BLM engage directly with the affected Indigenous groups in Canada to address this deficiency.

The PCMB notes that the circumstances of Canadian Indigenous subsistence users is the same as described in section 801 of the *Alaska National Interest Lands Conservation Act (ANILCA)*, where it is stated:

- the continuation of the opportunity for subsistence uses by rural residents of Alaska, including both Natives and non-Natives, on the public lands and by Alaska Natives on Native lands is essential to Native physical, economic, traditional, and cultural existence and to non-Native physical, economic, traditional, and social existence; and
- the situation in Alaska is unique in that, in most cases, no practical alternative means are available to replace the food supplies and other items gathered from fish and wildlife which supply rural residents dependent on subsistence uses.



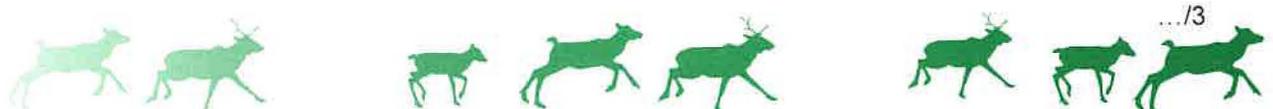
The SEIS should therefore consider how oil and gas development in the 1002 lands could be done while still meeting the objectives of the conservation section of the 1987 *Agreement Between the Government of Canada and the Government of the United States of America on the Conservation of the Porcupine Caribou Herd* (International Agreement), specifically:

- the principle of avoiding or minimizing activities that would significantly disrupt migration or other important behavior patterns of the Porcupine Caribou herd or that would otherwise lessen the ability of users of Porcupine Caribou to use the herd; and
- the direction that when evaluating the environmental consequences of a proposed activity, the parties will consider and analyze potential impacts, including cumulative impacts, to the Porcupine Caribou herd, its habitat and affected users of Porcupine Caribou.

Our second primary concern raised related to the proposed mitigations outlined in the current EIS. While potential impacts are acknowledged, no quantitative analysis or proof of the effectiveness of the proposed mitigations are provided. There is no scientific proof that the proposed mitigations would in fact limit the impacts on caribou and thus on the Canadian subsistence use of the PCH to an adequate degree. The current EIS also did not provide any assurance that lease holders would be required to demonstrate the effectiveness of proposed mitigations and that these mitigations would be adjusted if necessary. This was very concerning because current EIS asserted that no additional scientific studies or information was required to make these final decisions. Going forward, the PCMB requests that the latest science be applied to analyze potential environmental and cultural impacts and the effectiveness of mitigations before the program is permitted to continue. In particular, we are aware of some recent studies and ongoing research — some noted below — which should be carefully considered before impacts are thought to be effectively mitigated by existing but unproven strategies.

Climate change analysis was not incorporated in any way in the current EIS. This is despite the fact that this portion of Alaska and Yukon are witnessing some of the most significant climate-related changes globally (Thoman and Walsh 2019<sup>1</sup>). Recent analysis (Severson et al. 2021<sup>2</sup>) demonstrates that this type of analysis is possible for the PCH and also shows the significant risk of the proposed project to the PCH. Other available analyses (Russell and Gunn 2019<sup>3</sup>) also quantify the potential ramifications of climate change on the herd, yet the existing current EIS does not incorporate these considerations. A fulsome consideration of climate change influences is necessary to truly understand the effects of the proposed development.

The PCMB has created a Harvest Management Plan with all Canadian Parties to ensure the herd is managed through its population highs and lows. Russell and Gunn (2019) demonstrate that these changes in population can have a significant influence on effects to the herd and ultimately the population level impacts on the herd. The current EIS does not incorporate any consideration of a fluctuating population of the PCH, although these changes are known to occur.

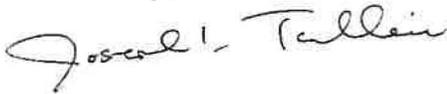


Significant new bodies of research have been undertaken and published over the past several years (some are currently in the process of publication), which address industrial influences on migratory and other ecotypes of caribou, including the influence of existing developments on adjacent caribou herds. The SEIS should consider these new sources of knowledge in a revised assessment of effects, including the probability, severity, reversibility, and consequences, based on recent research and published literature. Subsequently, it will be necessary to determine the impacts of industrial activities to subsistence use, as described earlier in this letter, as the current EIS failed to properly take these critical impacts into account.

Additionally, the PCMB asserts that to truly reflect the principles of conservation and minimization of adverse effects set out in the obligations outlined in the International Agreement, the current EIS should have recommended an alternative that made the minimum area required by law available for lease.

These comments are a summary and review of the PCMB's previous responses and general position regarding the EIS process. We look forward to these principles being addressed and reflected in the SEIS.

Sincerely,



Joe Tetlich  
Chair

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<sup>1</sup> Thoman, R. & J. E. Walsh. (2019). Alaska's changing environment: documenting Alaska's physical and biological changes through observations. H. R. McFarland, Ed. International Arctic Research Center, University of Alaska Fairbanks.

<sup>2</sup> Severson, J.P., H.E. Johnson, S.M. Arthur, W.B. Leacock, M.J. Sutor. 2021. Spring phenology drives range shifts in a migratory Arctic ungulate with key implication for the future. *Global Change Biology*, 27(19):4546-4563.

<sup>3</sup> Russell, D., and A. Gunn. 2019. Vulnerability analysis of the Porcupine Caribou Herd to potential development of the 1002 lands in the Arctic National Wildlife Refuge, Alaska. Report prepared for: Environment Yukon, Canadian Wildlife Service, and GNWT Department of Environment and Natural Resources. 143 pp.

