



Department of Environment
PO Box 2703, Whitehorse, Yukon Y1A 2C6

October 4, 2021

Bureau of Land Management, Alaska State Office
Attn: Coastal Plain Oil and Gas Leasing and Development Plan EIS
222 West 7th Avenue #13
Anchorage, Alaska, USA
99513-7599

Re: Scoping Phase Comments – Supplemental Environmental Impact Statement for the Coastal Plain Oil and Gas Leasing Program

The Government of Yukon provides the following input to the Bureau of Land Management (BLM) Alaska State Office for consideration in the preparation of a Supplemental Environmental Impact Statement (supplemental EIS) for an oil and gas leasing program in the Coastal Plain of the Arctic National Wildlife Refuge (ANWR)¹.

The Yukon shares a border with the ANWR of approximately 190 miles. The Government of Yukon's principal interest is in ensuring that transboundary impacts of development in the Coastal Plain are considered, avoided where possible, and mitigated where necessary. This includes impacts to species for which the Yukon, Canada, Alaska and the United States have co-management roles and responsibilities.

This submission focuses on the potential environmental and socio-economic effects that the Government of Yukon believes need to be considered and included in the supplemental EIS. Treaties and agreements between the territorial, state, and/or federal governments are identified in this submission to provide important context. Topics that have clear transboundary agreements and/or treaties include the Porcupine Caribou herd, polar bears, and migratory birds, and accordingly, should be scoped into the supplemental EIS. This submission includes issues raised by the Government of Yukon in comments on the previous EIS process completed in 2020 that were not sufficiently addressed.

The *National Environmental Policy Act* process must include analysis of reasonably foreseeable transboundary environmental and socio-economic effects of proposed activities². In addition, Section 1005 of the *Alaska National Interest Lands Conservation Act*

¹ For clarity, the Coastal Plain of the Arctic National Wildlife Refuge may also be referred to as the "1002 lands" in this submission and in other literature in reference to Section 1002 of the *Alaska National Interest Lands Conservation Act*.

² Council on Environmental Quality Guidance on NEPA Analyses for Transboundary Impacts. 1997. Memorandum to Heads of

(ANILCA) requires the Secretary of the Interior to consult with the appropriate agencies of the Government of Canada in evaluating impacts of oil and gas exploration, development, production, and transportation on wildlife resources, in particular impacts on the Porcupine Caribou herd. Further, 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* speaks to international cooperation and coordination between these governments so that irreversible damage or long-term adverse effects the herd or their habitat is minimized. The Government of Yukon will be supporting the Government of Canada in consultations with the Government of the United States on matters related to Porcupine Caribou and subsistence users.

As the previous EIS process completed in 2020 included an alternative allowing for the leasing of the entire Coastal Plain with no areas off-limits, we submit these comments on the assumption that this will again be an explored alternative. However, the Government of Yukon recommends that the supplemental EIS present an alternative that analyzes the leasing of 800,000 acres, as this is the minimum lease area requirement identified by Public Law 115-97. Should information or maps detailing a draft leasing plan or development scenario become available, we ask that they be shared. All alternatives considered in the supplemental EIS should include a robust quantitative analysis of potential impacts, including transboundary effects, supported by best-available research and evidenced-based rationale.

The following is a list of topics that the Government of Yukon requires to be addressed in the supplemental EIS.

1. Porcupine Caribou herd

The Porcupine Caribou herd is one of the largest migratory caribou herds in the world, with a range extending from Alaska through the Yukon and into the Northwest Territories in Canada (see Appendix 1). The Government of Yukon is committed to the conservation and management of the Porcupine Caribou herd throughout its range and recognizes its importance to the people and communities that depend on the herd for subsistence harvest and cultural sustenance.

As a result of the importance of the herd, and in consideration of the pipeline from Prudhoe Bay in the 1970s, the Canadian portion of the Porcupine Caribou herd's range north of the Porcupine River was withdrawn from industrial activities in the 1970s. Currently, the majority of the herd's summer range in Canada is protected permanently or has a long-standing withdrawal from industrial activities in place (see Appendix 1), including the full extent of the herd's calving and post-calving range. In the few remaining areas within the herd's Canadian summer range where some development is permitted, allowances for industrial disturbance are extremely conservative and would not allow a major development to occur. On the herd's winter range, limited development has been allowed in an area that sees less frequent use by the herd compared to core winter areas. All oil and gas wells drilled since the 1950s on the Canadian side of the herd's range have been abandoned or suspended.

The Government of Yukon has a significant concern with respect to the potential effects of

development in the Coastal Plain on Porcupine Caribou and the habitat critical to the herd's survival and long-term conservation. Subsistence users, who value caribou as a source of food and harvesting as an activity with cultural, health and recreational value, will also be affected by impacts to the herd. Our interest is in ensuring that the full impact of oil and gas activity on Porcupine Caribou and its habitat, and subsequent effects on subsistence users, is considered and to prevent irreversible damage or long-term adverse effects to the herd and its habitat. In Canada, the *Porcupine Caribou Management Agreement* (1985), an annex of the Inuvialuit Final Agreement (1984) – a comprehensive land claim agreement, established the Porcupine Caribou Management Board (PCMB or the Board). The PCMB is an advisory board that provides recommendations on harvest and management of the herd to responsible agencies. The Board is comprised of members appointed by representatives from the governments of Canada, the Yukon, the Northwest Territories, Tr'ondëk Hwëch'in, Vuntut Gwitchin First Nation, First Nation of Na-Cho Nyäk Dun, Gwich'in Tribal Council, and the Inuvialuit Game Council. The PCMB, and the Parties that form the Board, have all individually highlighted in numerous letters to the BLM the importance of the Coastal Plain of ANWR as a caribou birthing and rearing area, critical for the well-being of the herd and Canadian user groups. We request notice be sent to each of the above Parties and the PCMB as information becomes available on the supplemental EIS.

The Government of Yukon, together with the governments of Canada, the United States, Alaska, the Northwest Territories, the PCMB, and impacted Alaskan communities, also work on Porcupine Caribou herd matters through the International Porcupine Caribou Board (IPCB). The IPCB was established as per 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*. Through the Porcupine Caribou Technical Committee (PCTC), federal, state, and territorial technical staff work collaboratively to advance scientific research and monitoring of the herd. The information prepared by the PCTC is an unbiased and highly informed perspective on the needs of the Porcupine Caribou herd. The 1987 Agreement acknowledges that the Porcupine Caribou herd regularly migrates across the international boundary between Canada and the United States and that caribou – in their large, free-roaming herds – comprise a unique and irreplaceable natural resource of great value, which each generation should maintain sustainably for future generations.

Therefore, the Government of Yukon requests that full consideration be given to environmental impacts on the Porcupine Caribou, and subsequent socio-economic impacts to subsistence users, as required by international agreements. We ask that a review is provided on the relevant sections 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* with specific reference to what would constitute a "significant, long-term, adverse impact" to the herd or its habitat.

The Porcupine Caribou herd is part of the barren-ground caribou species found in Canada. In 2016 the species was assessed as Threatened by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), the national body designated by Canada's *Species at Risk Act*. The Government of Canada is still considering whether it will list this ecotype as Threatened under the *Species at Risk Act*. If listed, a Recovery Strategy will be developed to arrest or reverse species decline by identifying threats, critical habitat and management strategies.

a. Environmental effects on Porcupine Caribou

For Porcupine Caribou, the Government of Yukon requires the supplemental EIS examine, at a minimum, the following. Note: We recommend experts from the PCTC, including our technical staff, be engaged where resources and research have been highlighted for consideration to ensure data is represented objectively and accurately to achieve the best outcome for Porcupine Caribou.

Reviews and/or summaries of:

- The importance of the Coastal Plain to the Porcupine Caribou herd; the role this area play in the herd's life history, including figures showing use by biological period (e.g. calving, post-calving, early summer or insect relief, etc.). Consider work completed by Russell and Gunn (2019)³ and Severson et al. (2021)⁴
- Variation in use of the Coastal Plain by the Porcupine Caribou herd annually, and by decade, and leading hypotheses for why changes occur. Include all pertinent materials published on the herd, as well as relevant updates from the newest available information. Consider work by Severson et al (2021), Russell and Gunn (2019), Sutor et al (unpublished, provided to BLM in 2018)⁵ and Griffith et al (2002)⁶.
- The current role of climate in herd population dynamics and what is expected in the future. Consideration of current sensitivities for the herd with respect to habitat change and existing developments. Consider work completed by Russell and Gunn (2019) and Severson et al (2021).
- A summary of reproductive biology and ecology of the Porcupine Caribou herd with reference to other herds (and more specifically to the Central Arctic Caribou Herd), to point out similarities and differences, and the importance of calving and post-calving grounds to large migratory tundra caribou populations.
- Past assessments of the risk of development of the Coastal Plain to Porcupine Caribou and their key conclusions.
- The likely effects of development on the Coastal Plain on caribou behaviour and movements (e.g. migration routes, selection of calving areas, abandonment or stranding of specific seasonal habitats), including:
 - An assessment of alternative seasonal ranges and whether specific seasonal ranges could be limited by either the quantity or spatial structure of development in the Coastal Plain (e.g. insect relief habitat).
 - Given available climate change scenarios for the area, the anticipated effects for specific seasonal habitats.
 - An assessment of the influence that increased access into core areas of the calving and post-calving ranges for harvesters may have cumulatively with the creation of new

³ 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.

⁴ Severson, J. P., Johnson, H. E., Arthur, S. M., Leacock, W. B., & Sutor, M. J. (2021). Spring phenology drives range shifts in a migratory Arctic ungulate with key implications for the future. *Global Change Biology*, 27, 4546– 4563.

⁵ Sutor et al., 2018. Government of Yukon, unpublished data.

⁶ Griffith, Brad & Douglas, David & Walsh, Noreen & Young, Donald & McCabe, Thomas & Russell, D. & White, Robert & Cameron, Raymond & Whitten, Kenneth. 2002. Section 3: The Porcupine Caribou Herd. Arctic Refuge Coastal Plain Terrestrial Wildlife Research Summaries.

effects from development-related disturbances.

- The likely effects of oil and gas development on the Coastal Plain on Porcupine Caribou herd demographics rates, including recruitment, adult female survival, and the growth rate of the population (λ), including identification of the likely mechanisms of change. Specifically:
 - How recruitment metrics such as gestation, age at first parturition, and calf survival may change.
 - How metrics for adult cows, such as body condition, reproductive status, and survival will be altered as a direct result of effects.
 - Identification of any lag effects on cow or calf vital rates.
 - Any anticipated changes in age structure within the herd.
 - How the parameters will vary in the context of climate variability and change, including changes in forage quantity and quality.
 - The ability of other seasons to buffer the impacts caused by development.
 - Addressing the herd size and trend where we would anticipate the herd to be limited by the interaction between the development and the herd's inability to increase quickly (i.e., recruitment sink).
 - Consideration of likely effects on the herd as herd size varies (observed high, low, mean, and a 25% and 50% reduction in herd size), including consideration of impacts during changes in trend (increasing, stable, decreasing)
- The likely effects of oil and gas development on the Coastal Plain on caribou health (direct and indirect effects through forage, crowding, exposure to contaminants, and inability to move to new ranges).
- Relevant sections 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* with specific reference to what would constitute a "significant, long-term, adverse impact" to the herd or its habitat.
- Other developments within the range of the herd that may contribute to cumulative effects.
- A summary of available mitigations that could be applied to projects in the Coastal Plain. For each, a quantitative demonstration of the effectiveness should be provided through reference to peer reviewed literature where available, or by using data collected from existing monitoring programs (e.g. monitoring of effects for the Central Arctic Herd in Prudhoe Bay). Specific reference to how impacts may vary with a naïve vs. experienced herd should be included.
- Consideration of monitoring that would be required to evaluate the possible effects of development and the success of mitigations as part of an adaptive management framework. Monitoring should focus on anticipated likely impacts identified above; metrics that are feasible and sustainable logistically, financially, and socially; and should use an evidence-based design. Include estimates of the number of years of monitoring likely required to detect specific effect sizes for any given metric (i.e., similar to a power analysis). Include consideration of the requirement for a committee of industry and Porcupine Caribou technical experts to engage in a review of the mitigation successes and adaptive responses.

b. Socio-economic effects on subsistence harvest, food security, and human health in relation to Porcupine Caribou

The Government of Yukon is a signatory to modern land claim agreements (i.e. treaties) with the Inuvialuit and the First Nations of Tr'ondëk Hwëch'in, Vuntut Gwitchin, and Na-Cho Nyäk Dun. The Indigenous and treaty rights flowing from these agreements are protected by section 35 of the Canadian *Constitution Act, 1982*, which recognizes the right of Indigenous peoples to harvest wildlife species like the Porcupine Caribou as they have for millennia. Eight communities in Canada are specifically identified in the *Porcupine Caribou Management Agreement (1985)* as user communities of the Porcupine Caribou herd. 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* and ANILCA also have provisions regarding subsistence rights. It is estimated that Canadian users harvest between 4000-6000 caribou annually when the herd is readily available, which in most years makes up greater than 85% of the total harvest of the herd across all users.⁷ Canadian user groups are the primary harvesters of this herd and stand to lose the most from any impacts on the herd.

It is important to the Government of Yukon that the supplemental EIS consider project effects to subsistence rights of Inuvialuit and Canadian First Nations people in the socio-economic analysis, as Canadian subsistence harvest is constitutionally protected and is the bulk of harvest for this herd. Analysis should include:

- Current and potential harvest for the herd including identification of user group harvest levels, where harvest occurs and what the harvest is for each user group. Equal consideration and analysis should be given to Canadian and American subsistence users.
- In light of current and potential harvest, whether the herd's population and available harvest through time is sustainable and resilient in scenarios where critical habitats are impacted by development and climate change.
- The cumulative effects of oil and gas development, including environmental stochasticity and long-term projections of climate change on subsistence users (as defined in the 1987 International Agreement), including herd size and availability and implications for harvest management.

The nutritional value of caribou contributes to the health of populations using this traditional food source. Market-based foods in northern communities is more expensive than southern or heavily-populated jurisdictions, exacerbating issues of food insecurity for households with limited income, and potentially increasing needs for income supports. Increased obesity and related chronic diseases have also been associated with a shift towards market foods among Indigenous populations⁸. Traditional food sources – whether harvested directly by a household member, or obtained through sharing or bartering – provide a supplementary source for those who are unable to afford market prices for a complete nutritious diet.

Even for individuals who can afford and have access to equivalently nutritious foods, caribou is still a preferred dietary option. The harvesting and consumption of caribou is an activity with

⁷ Porcupine Caribou Management Board. 2010. Harvest Management Plan for the Porcupine Caribou Herd in Canada. Available from: <https://pcmb.ca/documents/Harvest%20Management%20Plan%202010.pdf>

⁸ Damman, S., W.B. Eide, and H.V. Kuhnlein. 2008. Indigenous peoples' nutrition transition in a right to food perspective. *Food Policy* 33:135-155.

cultural, health and recreational value. Individual and community well-being may be supported or enhanced through participation in traditional activities - increasing or protecting cultural, intergenerational and community connectedness, and building or enhancing a sense of accomplishment or self-sufficiency. The act of harvesting itself is a form of physical activity that provides health benefits.

Impacts to the calving grounds and/or migration patterns of the Porcupine Caribou herd would affect several communities in the Yukon, Alaska and the Northwest Territories. These communities would be prevented or limited in their ability to rely on caribou as a food source, to participate in the associated cultural and recreational activities, and therefore to receive the multiple benefits to physical and mental well-being. Diminished availability of caribou or declining caribou health could result in an increased need for and use of social services (e.g. income supports; mental health services). Health services may also be impacted over the long term due to the risk of increased obesity and related chronic diseases.

The following must be considered and examined in this supplemental EIS:

- Food security for communities and populations who use the Porcupine Caribou herd as a primary food source throughout the herds range.
- Impacts on individual and community well-being in connection with the herd.
- Impacts, such as increased demand, to limited services for health and social programs if access to caribou as a subsistence and cultural resource is diminished.

It should be noted that impacts on individual and community well-being associated with loss of a culturally important resource and practice may not be resolved by mitigations to address food insecurity in the event that the Porcupine caribou herd was no longer available to communities.

2. Species at risk: Special concern

The Government of Yukon recommends that the supplemental EIS consider impacts to species listed under Schedule 1 of the Canadian *Species at Risk Act* whose populations are shared between the Yukon and Alaska. In particular, Government of Yukon would like to highlight those species of economic, social, and cultural importance to Yukoners and in particular the subsistence users that rely on them.

For all species listed below – and in addition to specific considerations detailed below for each species – analysis and study of impacts must take into consideration:

- Risks and impacts of malfunctions, and the significance of those impacts, including risk of accidents/malfunctions to marine environments.
- Cumulative effects of this proposed development and existing anthropogenic and natural stressors on key species and habitat.
- A complete description of the use and importance of the Coastal Plain in ANWR to each life stage of each species, during each season of the year, and across multiple years (preferably decades – e.g. using the scale of time for major climate forcing cycles such as the Pacific or Arctic Decadal Oscillations). Descriptions should include scientifically defensible methods of delineation and rating of areas for importance.
- Interactions between species such as predator-prey dynamics.
- How spatial and temporal use by a species may change in the future as a result of climate

change with changes to spring snow melt and plant phenology, precipitation, temperature, permafrost, and offshore ice conditions and extent as it influences on-shore use by the species.

- Species-specific zones of influence of various infrastructure elements and barriers to movement.
- Spatially explicit consideration and confirmation of go/no go areas for development (including road access and routing) in the Coastal Plain to conserve and protect key wildlife species.
- Potential mitigations that could be applied to oil and gas projects in the Coastal Plain. For each, a quantitative demonstration of the effectiveness should be provided through reference to peer reviewed literature where available, or by using data collected from existing monitoring programs.

a. Polar bear

In addition to its listing under the Canadian *Species at Risk Act*, polar bear is listed as "Threatened" under the United States *Endangered Species Act*. They are a species of international conservation concern. The 1973 *Agreement on the Conservation of Polar Bears* is a multilateral treaty signed by the five polar bear range states (Canada, the United States, Denmark (Greenland), Norway and Russia (formerly Union of Soviet Socialist Republics)) to foster cooperation in sustainably managing polar bear populations. Canada and United States are also subject to the 2008 *Memorandum of Understanding between Environment and Climate Change Canada and the United States Department of the Interior for the Conservation and Management of Shared Polar Bear Populations*.

Subsistence harvest of polar bears is an important cultural and economic value and as a food source for the Inuvialuit of Canada.

The supplemental EIS must consider effects of development on polar bear, in particular:

- Assessment of bear denning habitat including assessment of denning habitat quality.
- Potential effects of disturbing denning females in winter.
- Potential effects of any other anticipated impacts during other seasons including the summer where bears aggregate on shore.
- Potential effects of incidental take as a result of increased human-bear conflict.

b. Grizzly bear and wolverine

Grizzly bear and wolverine are sensitive to harvest and anthropogenic disturbance. Recent analysis indicate that grizzly bear population size and availability for subsistence harvest is directly linked to the presence and abundance of the Porcupine Caribou herd⁹.

Grizzly bears and wolverine on the Yukon North Slope are managed specifically for the Inuvialuit's subsistence use. The supplemental EIS must consider:

- Assessment of denning habitat and denning habitat quality.
- Use of the area in spring, summer and fall.
- Assessment of known human-caused mortality of grizzly bear in the area.
- Assessment of the effective loss of habitat for grizzly bear within the zone of influence of infrastructure. An assessment of these potential effects needs to be carried out at a scale

⁹ Department of Environment Fish and Wildlife Branch, Government of Yukon, unpublished data.

(recommended watershed units of about 300 km²) appropriate to the multi-annual home range bears.

- Assessment of changes in population size in Canada caused by any changes in availability of the Porcupine Caribou herd.
- Potential for development in the Coastal Plain to create a population sink for grizzly bear and wolverine and how that may impact Canadian subpopulations.

3. Tourism in North Yukon

The current tourism market in North Yukon is small but increasing. It is important that Old Crow and Vuntut Gwitchin First Nation maintain the ability to develop their cultural tourism industry and visitor market. Natural resources like the Porcupine Caribou herd are an integral feature to the overall experience and significant motivating reason for tourist travel to the region. Vehicle traffic to northern parks, including Tombstone Territorial Park, and cruise ship traffic on the north coast are increasing, bringing record numbers of visitors to the region in recent years. The two features of the North Yukon region that have the most potential for drawing visitors are wildlife viewing and cultural tourism. The Yukon's Visitor Tracking Program surveyed 19 different visitor experiences, and wildlife viewing is ranked the highest in providing satisfaction and is ranked second (out of 19 activities) in importance for making the decision to come to the Yukon¹⁰.

Of the wildlife features that attract visitors to Old Crow and the surrounding area, the Porcupine Caribou herd is at the top of the list. The herd is also closely tied with the cultural aspects of the region and would feature prominently in cultural products.

Other key wildlife viewing activities important for tourism in the region are bear viewing and bird watching. Ni'iinlii Njik (Fishing Branch) Ecological Reserve and Settlement Land has hosted a commercial bear viewing business for more than 10 years. The Ni'iinlii Njik Management Plan¹¹ states that "...effectively managed viewing has the potential to increase public understanding and appreciation of bears and bear ecology...and under controlled circumstances, increase tourism and provide economic benefit". Tombstone Territorial Park includes a wide range of habitats that support 145 recorded bird species. The area attracts birdwatchers from around the world¹². Pristine wilderness and parks are key features of the North Yukon region. Ivvavik National Park and Vuntut National Park border on Alaska and the ANWR. Qikiqtaruk (Herschel Island) Territorial Park, Ni'iinlii Njik (Fishing Branch) Territorial Park, and Tombstone Territorial Park all create tourism revenue for the region. Tombstone Park is becoming increasingly popular. Tombstone Park, accessible via the Dempster Highway, saw record numbers in 2017. Visitor statistics taken at the Tombstone Interpretive Centre, showed an increase of 46% between 2016 and 2017¹³. This indicates potential for more tourism in other parts of the north region.

The tourism industry also considers it of high importance to limit impacts to areas that remain intact, and to limit impacts to species in the Yukon that are specially protected, in order to

¹⁰ Government of Yukon. 2013. Yukon Visitor Tracking Program. Available from: <https://yukon.ca/sites/yukon.ca/files/tc/tc-yukon-visitor-tracking-program-visitor-segmentation-report-2012-13.pdf>

¹¹ Government of Yukon. 2010. Ni'iinlii Njik (Fishing Branch) Ecological Reserve & Settlement Land Management Plan. Available from: <https://yukon.ca/sites/yukon.ca/files/env/env-niinlii-njik-ecological-reserve-and-settlement-land-management-plan.pdf>

¹² Government of Yukon. 2009. Tombstone Territorial Park Management Plan. Available from: <https://yukon.ca/sites/yukon.ca/files/env/env-tombstone-territorial-park-management-plan.pdf>

¹³ Parks Branch, Government of Yukon, unpublished data.

preserve the region as a pristine and desirable wilderness destination.

The supplemental EIS must consider the following:

- Socio-economic impacts to existing and potential wildlife and wilderness tourism opportunities in the Yukon adjacent to the ANWR and areas within the range of the Porcupine Caribou herd.
- Likelihood and potential for impacts to the Yukon lands and parks adjacent to the ANWR, including a zone of influence caused by activities in the Coastal Plain.

4. Traditional Knowledge

The Government of Yukon recommends that the supplemental EIS integrate traditional knowledge of Indigenous Peoples in Canada and the United States when considering effects of the oil and gas leasing program. We strongly urge the BLM to engage directly with affected Canadian First Nation and Inuvialuit governments on this topic.

Conclusion

Oil and gas development in the Coastal Plain of the ANWR risks adverse environmental and socio-economic effects that will be felt beyond the boundaries of the reserve and will extend across international borders. The Government of Yukon will continue to work with our counterparts in First Nation, Inuvialuit, state, territorial and federal governments through our involvement with various Boards and Technical Committees. We would be pleased to make our scientific experts, products, data and reports available to BLM in preparing the draft supplemental EIS. We will also provide support to the Government of Canada to fulfill the ANILCA consultation obligations.

The Government of Yukon looks forward to continued active involvement in providing input to the supplemental EIS for the Coastal Plain oil and gas leasing program.

Please direct future correspondence and information updates to Christine Cleghorn (christine.cleghorn@yukon.ca), Assistant Deputy Minister, Environmental Sustainability, as the designated contact for this supplemental EIS process.

Sincerely,



Nils Clarke
Minister of Environment

Enclosure:

Appendix 1: Porcupine Caribou core range and protected areas (map)

Appendix 1: Porcupine Caribou core range and protected areas

