



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



December 09, 2020

Chad Padgett, State Director
BLM-Alaska State Office
222 West 7th Ave. #13
Anchorage, AK, 99513
by email: blm_akso_ak932_cpcomments@blm.gov

Dear Mr. Padgett:

RE: Coastal Plain Lease Sale

I am writing on behalf of the Government of Yukon, to state our opposition to oil and gas lease sales in the Arctic National Wildlife Refuge. The Government of Yukon is very concerned that the timeline for the notice of sale for the Coastal Plain Oil and Gas Leasing Program does not allow the Bureau of Land Management to consider comments provided during this call for nominations period. We respectfully request that all comments be considered fairly and carefully in decisions regarding lease sales.

Development activities in tracts identified by the Bureau of Land Management for lease sale have the potential to cause significant adverse impacts to important transboundary species, and in turn, the people who rely on them. The attached Nomination and Comment Worksheet provides specific technical information on potential impacts to the Porcupine caribou herd and the South Beaufort polar bear subpopulation, as well as an assessment of each tract's importance to conservation interests.

The Government of Yukon has consistently identified that development in the Arctic National Wildlife Refuge has a high risk of significant negative impacts to wildlife populations, including the Porcupine caribou herd and polar bears. We provided comments on the Coastal Plain Oil and Gas Leasing Program Environmental Impact Statement and the subsequent Record of Decision. We also provided comments on the Marsh Creek East Seismic Exploration Environmental Assessment.

The Porcupine caribou herd uses the Arctic National Wildlife Refuge as critical calving and post-calving habitat. In some years, this use will extend into early and mid-summer periods, which coincides with the period where the herd forms large, dense aggregations of caribou attempting to avoid insects. This area provides protection, nutrients and insect-relief that the herd requires at these important stages of their life-cycle.

.../2

Page 2
Mr. Padgett
December 09, 2020

The Government of Yukon's major role in research and management of the Porcupine caribou herd makes us uniquely able to provide comments on the tracts identified for lease sale.

The Government of Yukon is a member of the International Porcupine Caribou Board, the Porcupine Caribou Management Board, and the Porcupine Caribou Technical Committee. In recent years, and in partnership with several other governments, the Government of Yukon and the Alaska Department of Fish and Game have led most of the technical aspects of managing the herd including maintenance and management of the collar program, habitat and seasonal distribution analyses, population and demographic data estimation, and harvest management here in Canada. In particular, the Government of Yukon has led efforts to manage the spatial data collected for the herd. Our comments in the attached Comment Worksheet reflect this expertise and knowledge.

The Arctic National Wildlife Refuge is also an increasingly important denning area for polar bears of the Southern Beaufort subpopulation. Current trajectories point to an ever-increasing use of land-based sites for denning of this subpopulation, and the Arctic National Wildlife Refuge contains a disproportionate number of these sites. As a shared resource between Canada and the United States, and valued internationally, protection of polar bears from human developments is of utmost importance.

Notwithstanding variability in the level of conservation interest between individual tracts, as described in the attached, the Government of Yukon remains entirely opposed to lease sales in the Arctic National Wildlife Refuge. The Government of Yukon is not opposed to sustainable development; however, as identified in the comments we submitted to the recently completed Record of Decision, we do not believe the Bureau of Land Management has given due consideration for conservation values and the risks that development would pose to those values. The Government of Yukon urges the Bureau of Land Management to give full and fair consideration of our attached comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Hennings', with a stylized flourish at the end.

Ryan Hennings
Director of Fish and Wildlife

Enclosure: Oil and gas lease sale nomination and comment worksheet