



Chad Padgett, State Director
Bureau of Land Management, Arctic District Office
222 West 7th Ave., #13
Anchorage, AK 99513
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December 15, 2020

Re: Arctic National Wildlife Refuge Oil and Gas Lease Sale Call for Nominations

Dear Mr. Padgett,

We write to you today as Chairs of three of the wildlife management bodies for the Inuvialuit Settlement Region, which abuts the Alaska border. Below, we have outlined several major concerns with the current call for nominations for oil and gas leasing in the Coastal Plain of the Arctic National Wildlife Refuge (ANWR). We continue to have concerns about this process, principally the commencement of the call for lease sales before the call for nominations comment period is complete. Please note that nothing within this submission is to be construed as support for this project by our respective organizations.

Our first major concern is the likelihood of negative effects on the Porcupine Caribou Herd. A majority of the tracts identified for nomination are critical for the Porcupine Caribou to meet their life requirements. Several of these tracts are used regularly for calving and post-calving by this herd. Development in these areas would likely have a high risk of adverse effects to this herd.

From an ecological perspective, the proposal of any industrial activity in the calving range of the Porcupine Caribou Herd is absurd. The risk is simply too great. Similarly, the risk to an essential Inuvialuit food source is unacceptable. The Inuvialuit have depended on this herd for hundreds of years for food, cultural and social well-being. The importance of this caribou herd to the

Inuvialuit is reflected in the protections and conservation measures provided under the Inuvialuit Final Agreement and the Porcupine Caribou Management Agreement which the Inuvialuit are signatories to.

In addition, a number of the tracts also include polar bear denning habitat for Southern Beaufort polar bears, a subpopulation that both the Inuvialuit and Inupiat rely on and co-manage through the Inuvialuit-Inupiat Polar Bear Joint Management Agreement in the Southern Beaufort Sea. Survey information has identified a number of polar bear dens throughout the tracts. Successfully mitigating impacts to these sensitive locations will be difficult, if not unfeasible. Impacts to these and other species that rely on this area will have cascading impacts on these joint efforts, further endangering our ability to successfully conserve these species, especially in light of ongoing climate change impacts.

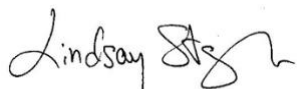
The Councils are not against development but feel that there needs to be a balance struck between economic gain and indigenous cultural and social well-being. We are troubled by the regulatory process to expedite this proposed development as it does not seem to take into account the potentially irreversible negative impacts that oil and gas development in ANWR may have on these species, the habitat they rely on and the many indigenous groups that depend on them for their traditional practices and subsistence means. Given the high potential for significant and lasting negative effects to at least two transboundary species with international management agreements in place, this regulatory process is not just unrealistic: it is an affront to the spirit and intent of those agreements.

Due to the above noted concerns, our Councils oppose the sale of the identified tracts and development in the Coastal Plains of Arctic National Wildlife Refuge.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jim Elias', with a stylized, flowing script.

Jim Elias
Chairperson, Inuvialuit Game Council

A handwritten signature in black ink, appearing to read 'Lindsay Staples', with a stylized, flowing script.

Lindsay Staples
Chairperson, Wildlife Management Advisory Council (North Slope)

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

Larry Carpenter

Chairperson, Wildlife Management Advisory Council (Northwest Territories)