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[EXTERNAL] Public Comment

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To whom It May concern,

The Porcupine Herd generally winters within the the Northwest Territories of Canada and migrates north, including within Yukon Territory, to the coastal plain in Alaska in spring and back again—up to 3,000 miles annually. The caribou herd, not the imposed political boundary, determines where Gwich'in live. The Gwich'in's 13 villages and tribes—about 9,000 people—are spread along the Herd's traditional routes on both sides of the U.S.-Canadian border. In 1987, the U.S. and Canada crafted an "Agreement Between the Government of Canada and the Government of the United States of America on the Conservation of the Porcupine Caribou Herd." It was signed by the Canadian Minister of the Environment and the US Secretary of the Interior.

This Agreement recognizes the need for international cooperation in conserving the Porcupine Caribou Herd. It recognizes the importance of doing so for generations of Peoples who depend upon and are responsible for the well-being of the Herd and its lifescape. The objectives of the Agreement include appropriate actions by both the US and Canadian governments to "ensure that the Porcupine Caribou Herd, its habits and the interests of users of Porcupine Caribou are given effective consideration in evaluating proposed activities within the range of the Herd." This includes the coastal plain of Alaska, which is the Herd's traditional calving ground. This Agreement includes the promise that activities that will potentially affect the Herd or its habitat "will be subject to impact assessment and review consistent with" regulations of both countries. And, where an activity in one country is likely to have adverse consequences to the Herd, that country is to be consulted prior to a final decision on that activity.

Dana Tizya-Tramm, a Vuntut Gwich'in Councillor from Old Crow in the Northern Yukon, Canada traveled to the May 29th Fairbanks, AK scoping meeting. He also traveled to Washington, D.C. last year to testify in the Senate Energy Committee against opening the coastal plain to oil and gas activities. On the 29th, he testified that the U.S. process moving those activities forward "is a complete representation of the complete degradation of you democracy." Contrary to public agreements and public will, drilling has been "pushed through." "This is about money, this is about oil and gas, because it is definitely not about honoring agreements."

From the U.S. Ed Alexander, Gwich'yaa Gwich'in from Fort Yukon and co-chair of Gwich'in Council International, who "unilaterally condemn oil and lease sales," warned it was "un-ethical not to heed Gwich'in" in a "rushed process that may destroy our ways of life." It also violates international agreements, he stressed.

Drilling in the coastal plain is a direct Canadian as well as U.S. issue involving international concerns, responsibilities, and agreements. The U.S. BLM's scoping process must recognize the concerns, recommendations and needs of members of the Gwich'in Nation and others concerned in Canada. An April 20, 2018 Yukon-News article quotes the Environment Minister of Yukon, Pauline Frost, who is also MLA for Vuntut Gwich'in: "We most certainly support and firmly believe that development in the calving grounds is not sustainable and all the parties (in the Canadian delegation) have affirmed that," she said. "We do also want to look at the Indigenous rights and the importance of the caribou to the people and the communities."

A requirement of BLM's environmental review process on drilling in the coastal plain of the Refuge is to consider transboundary concerns. These concerns include not only adverse effects of drilling on the coastal plain, its caribou herd and the human beings and cultures interdependent with them, but also the very genesis of P.L. 115-97 as in violation of international agreements between the U.S. and Canada.

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