

To: BLM_AK AKSO_NPR_A_IAP_Admin
Record[blm_ak_akso_npr_a_iap_admin_record@blm.gov]; Chad Ricklefs[chad.ricklefs@empsi.com];
Katie Patterson[katie.patterson@empsi.com]; Molly McCarter[molly.mccarter@empsi.com]; Fritz,
Stacey[sfritz@blm.gov]
From: Rice, Stephanie
Sent: 2019-02-15T20:19:18-05:00
Importance: Normal
Subject: Fwd: [EXTERNAL] RE: Comment Deadline for NPR-A IAP in e-Planning
Received: 2019-02-15T20:20:00-05:00
[comments.2.15.19.pdf](#)

Here's written comments from NVN.

Stephanie Rice
Planning and Environmental Coordinator
BLM Alaska - Division of Resources
Desk: (907) 271-3202

----- Forwarded message -----

From: **Native Village of Nuiqsut** <native.village@astacalaska.net>
Date: Fri, Feb 15, 2019 at 3:31 PM
Subject: [EXTERNAL] RE: Comment Deadline for NPR-A IAP in e-Planning
To: Rice, Stephanie <srice@blm.gov>

Good Afternoon Stephanie!

Here is the attachment of NVN Comments!! Please let me know if you had received it!

Quyanaqpak!

Doreen Kosbruk

Tribal Admin. Assistant

From: Rice, Stephanie
Sent: Friday, February 15, 2019 10:00 AM

To: adminassistant@cityofwainwright.com; alli.harvey@sierraclub.org;
aoc@alaskaoutdoorcouncil.org; assistantvillageofwainwright@gmail.com; margaret_ahngasuk@barrette@acsalaska.net; charlie@nsedc.com; charris@maniilaq.org;
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[AguvlukNashookpuk](#); [Amy Ekak Bodfish](#); [Angel Ipalook](#); [Anthony Edwardsen](#); [Anthony Neakok](#); [April Brooks](#); [April Brower](#); [Archie Nukapigak](#); [Arlene Thomas](#); [Ben Ahmaogak, Jr.](#); [Bernice Kaigelak](#); [Bessie Ahvakana](#); [Bill Tracey Jr.](#); [Bill Tracey Sr.](#); [Billy Adams](#); [Blair Patkotak](#); [BLM AK AKSO NPR A IAP Admin Record](#); [Bob Henszey](#); [Bob Shears](#); [Bonnie Million](#); [Brandon S Viator](#); [Brent Veltkamp](#); [Brian Carter Boyd](#); [Bridget Psarianos](#); [Brook Brisson](#); [Brooke Merrell](#); [Brumbaugh, Robert](#); [Bud Cribley](#); [Bud Washburn](#); [Carla Sims Kayotuk](#); [Carol Akerelrea](#); [Caryn](#); [Casey Boespflug](#); [Casey Burns](#); [Charles S. Hugo](#); [Cheryl Panik - City of Wainwright Clerk](#); [Chris P Wrobel](#); [Cindy Arnold](#); [City of Anaktuvuk Pass](#); [City of Atqasuk](#); [City of Nuiqsut](#); [City of Point Hope](#); [City of Utqiagvik](#); [City of Wainwright Clerks](#); [Connor Dunn](#); [Craig A. Jacobson](#); [Craig Nicholls](#); [Crawford Patkotak](#); [Cribley, Bud](#); [Culliney, Susan](#); [Curtis, Jennifer](#); [Dale Hoffman](#); [David Arnold](#); [David Fauske](#); [David Kippi](#); [David R. Krause](#); [Dean Rampy](#); [Debora Nigro](#); [Delbert J. Rexford](#); [Della R. Driggs](#); [Demoski, Robin](#); [Desiree Romann](#); [Don Eller](#); [Donna Wixon](#); [Dora Ahkiviana](#); [Dora Leavitt](#); [Doreen Kosbruk](#); [Doreen Simmonds](#); [Dorothy Edwardson](#); [Douglas Ballou](#); [Dwayne Jr. \(Andrew\) Hopson](#); [Edith Vorderstrasse](#); [Elizabeth Bordeaux](#); [Elizabeth Ipalook/KSOP](#); [Ella Stalker](#); [Elsie Mekiana-Rec Director](#); [Eric Geisler](#); [Eric Tausch](#); [Erin Julianus](#); [Esther Hugo](#); [Esther Hugo](#); [Ethel Burke](#); [Eunice Brower](#); [Eva Patton](#); [Evelyn Aubie Gregg](#); [Fannie Akpik](#); [Fannie Suvlu](#); [Frances Mann](#); [Fred Kanayurak](#); [Frederick Brower](#); [Fritz, Stacey](#); [Gail McKenzie](#); [Gene Pavia](#); [George Edwardson](#); [George Olemaun](#); [Georgianna H. Gordon](#); [Geraldine Ningeok](#); [Gordon Brower](#); [Gordon Brown](#); [Governance Olgoonik](#); [Grefsrud, Pamela](#); [Greg Balogh - NOAA Federal](#); [Hamfler, Cindy](#); [Heather N Bottrell](#); [Herbert Kinneeveauk Jr](#); [Hopson Dwayne Sr. \(hopsonrd@gmail.com\)](#); [Howard Patkotak](#); [Hubert \(Jobe\) Chakuchin](#); [Hugh Patkotak](#); [Imm. Teresa](#); inukapigak@kuukpik.com; [Inuuraq Moss](#); [Inuuteq Stotts, VOICE](#); [ira ungdruk](#); [Iris Korhonen-Penn](#); [Jack Panik](#); [Jack Schaefer](#); [Jake Jacobson](#); [James Griffin](#); [James Hart](#); [James Taalak, City of Nuiqsut Cultural Coordinator](#); [Jan Caulfield](#); [Jane Tukrook](#); [Janet Ahlalook](#); [Janowski, Tyler](#); [Jason Bergerson](#); [Jeanie Cole](#); [Jeff Bruno](#); [Jennifer Tobey](#); [Jim Nash, Pres., NV Pt Hope](#); [Joan Bowers](#); [John Ford](#); [John Hopson Jr.](#); [John Nicholls](#); [John Toopetlook Jr.](#); [Jorjena Barringer](#); [Joseph Ahmaogak](#); [Joseph Akpik NVN Council](#); [Joseph Balash](#); [Joseph Nukapigak](#); [Joshua Okpowruk](#); [Joshua Sidon](#); [Julie Itta](#); [Julius.Rexford](#); [Karen Laubenstein](#); [Katherine Brower](#); [Kathleen Blizard](#); [Katt Morry](#); [Keeney, Joseph](#); [Kelly Miller](#); [Ken Robbins](#); [Kenneth \(Alan\) Peck](#); [Kenning, Erik](#); [Kevin S. Fisher](#); [Kim Neakok](#); [Kristi Williams](#); [Kristine Bennett](#); [Krystal Debenham](#); [Kuukpik Hotel](#); [Larae Agnasagga](#); [Larry Burris](#); [Larry Kasak](#); [Lars Nelson](#); Ichinn@kuukpik.com; [Leanna Mack, NSB Dep. Advisor to the Mayor](#); [Leonard Lampe](#); [Lesia Monson](#); [Lesli Ellis-Wouters](#); [Lillian Lampe](#); [Lisa Baraff](#); [Lisa Gleason](#); [Lloyd Paningona](#); [Lonnie Bryant](#); [Lorraine Rexford](#); [Lottie Jones](#); [Louise Smith](#); [Lucy Neakok](#); [M Turner](#); [Mackey Phillips](#); [Mamie Pardue, City of Nuiqsut Mayor](#); [Margaret Pardue](#); [Margie Hobson](#); [Marie](#)

Rexford; Marie Tracey; Marjorie Long; Mark Foster, Kuukpik Corp.; Mark Major; Mark Storzer; Marlene Bolt; Martha Itta; Martha Itta (personal); Martineau, Faith C (DNR); Marty Awalin; Mary Cabinboy; MaryEllen Ahmaogak; MaryEllen Young; Matt C. Dunn; Matt McDaniel; Matt Moore; Matt Whitman; McIntosh, Stacie; Mel Wong; Mendivil, Gary A (DEC); Michael J Nelson; Michael Mora; Michelle Ethun; Mike Bennett Sr.; Mike Pederson; Miller, Mark; Miriam (Nicole) Hayes; Moire Duggan; Moore, Stephen A POA; Native Village of Barrow; Native Village of Kaktovik; Native Village of Nuiqsut Admin; Native Village of Point Lay; Native Village of Point Lay IRA Council; Neil DeWitt; Nellie Kaigelak; Nichelle (Shelly) Jones; Nicole Whittington-Evans; Nora Jane Burns; NUC-ALL; Olivia Cabinboy; Panigeo Dennis; Patrick Lavin; Patrick Mekiana AKP; Paul Bodfish Sr.; Paul Kaigelak; Pearl Neakok; Peg Tileston; Peggy Frankson; Pekich, Lisa L; peter aengst; Peter Butteri; Peter Panik; Peterson, Valli L; Philip Tikluk; Point Lay; Randy Goodwin; Ray Atos; Raymond Aguvluk; Raymond Nashookpuk; Rebecca Noblin; Rene and Sam Kunaknana; Rex Snyder; Rick Trupp; Robert Thompson; Robyn E McGhee; Rosanne Lampe; Rosemary Ahtuanguaruak; Roxy (roxvovagak@hotmail.com); Roy Nageak; Ryan Oyagak; Sam Kunaknana; Sara Taylor; Sarah Conn; Sarah LaMarr; Sarah M. Kenshalo; Sarah Saunders; Sayers R. Tuzroyluke Sr.; Scott Guver; Scott Nish; Serena Sweet; Sharon Aiken File; Sheila Burke; Sophie Tracey; srmanuel@live.com; Stephen Wackowski; Steve E. Leavitt; Steve Segevan; Susan Kittick-Atos; Suzan Simonds; Suzanne Bostrom; Suzanne Little; Takpaan Nukapigak; Ted Murphy; Terry Qaqsu Tagarook; Thomas Heinlein; Thomas L. Lohman; Thomas Napageak, Jr.; Thomas Olemaun; Thomas, Brad C; Thor Stacey; Tim Fullman; Timothy Ferreira; Timothy LaMarr; Todd Sformo; Tom Nukapigak; Tony Cabinboy; Tony Vellat (anthony.vellat@north-slope.org); Trapper School; Vanessa Rathbun; Vernon Edwardsen; Veronica Morales; Vincent Bodfish; Virginia Tagarook; Vosburgh, Timothy; Wainwright ICAS Liaison; Wanda Kippi; Wayne Cary; Wayne Svejnoha; Wendy Brower; Weston Howe; William (Randy) Reed; WILLIAM HOPSON; Willie Goodwin; Winters, Jack F (DFG); Yereth Rosen; Yoder, Sarah A (HSS); Zachary Lyons
Subject: Comment Deadline for NPR-A IAP in e-Planning

Dear Stakeholders, this is a reminder that the scoping comment deadline for the National Petroleum Reserve in Alaska Integrated Activity Plan is today. Please see below guidelines for submitting your comments:

Electronically on the BLM's e-Planning page: Comment must be submitted by 10 pm Alaska time

Sending via Fax: Comments must be faxed by midnight Alaska time

Mailing comments: Comments must be postmarked with today's date

Dropping comments off in the BLM Public Rooms: Comments must be dropped off by 4 pm and date stamped with today's date

More information on submitting comments can be found [here on the BLM's e-Planning page.](#)

Stephanie Rice

Planning and Environmental Coordinator

BLM Alaska - Division of Resources

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N^VN
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February 15, 2019

Stephanie Rice, IAP Project Lead
Bureau of Land Management
222 West 7th Avenue, Stop #13
Anchorage, Alaska 99513

Re: National Petroleum Reserve-Alaska Integrated Activity Plan Scoping Comments

Dear Ms. Rice,

Please accept these comments on behalf of the Native Village of Nuiqsut (NVN), a Bureau of Indian Affairs federally-recognized tribe, regarding the Bureau of Land Management's (BLM) request for scoping comments on the National Petroleum Reserve-Alaska's (NPR-A) Integrated Activity Plan (IAP).

The Nuiqsut Tribal Council is the legally constituted governing body of NVN and is charged with the responsibility of exercising the inherent right of self-determination for the NVN Tribe. NVN is the only local Nuiqsut entity with the explicit responsibility, as defined by our constitution, for protecting subsistence resources, traditional cultural practices, and the welfare of the tribal community. As we have stated before, NVN fulfills this responsibility by providing comments and position statements with respect to both proposed and operating industrial activities, and land management proposals and decisions.

We do not think this land management plan should be redone to facilitate more oil development around our community, within our irreplaceable subsistence use areas, and in places that are necessary for our subsistence resources to thrive. As we have stated countless times, our community is already inundated with countless exploration and development projects and the true impacts of these activities are not yet fully understood. Re-doing this plan is at the discretion of the administration and all planning should be stopped.

This process has already had many problems. How BLM moved forward with this scoping period during the government shutdown has caused significant confusion within our community, and we have not been kept well up to speed on the process. If this process moves forward, we expect BLM not to rush this planning effort or to conform to arbitrary one-year

timelines. We also expect that all analysis use the best traditional knowledge and science, and accurately articulates impacts to ecological and social systems, particularly subsistence resources and practices.

Many of our concerns with this planning process are issues that we have raised before with various oil-related activities around our community. Within the brief following letter, we specially address: 1) government to government consultation, 2) environmental justice, 3) NVN's land management rubric, 4) subsistence, and 5) human health.

1. Ensuring effective and meaningful government to government consultation

As the IAP process moves ahead, we encourage BLM to engage in constructive and meaningful government to government consultation with NVN. NVN would like to play an active role in the decision-making process and in the management of the region's natural resources. However, too often we feel that our feedback and concerns are not effectively heard and incorporated into land use authorizations. We feel that our relationship with BLM, and other federal agencies involved in the management of the NPR-A, can be improved.

In an effort to develop a more constructive relationship with the federal government, we feel that a series of steps can be taken to ensure that our voice is heard during the planning process. What follows are a series of principles and recommendations that we believe will help better the government to government consultation process. These concepts include:

- Making clear that the Tribe's role is more involved and robust than the general public;
- Setting-out specifically how the government-to-government consultation process should occur for the IAP process;
- Defining tribal involvement in this NEPA process, including when and how BLM will meet with and involve NVN in reviewing this project's details and the potential impacts that it will have on the community;
- Explaining how BLM will address and respond to NVN's comments and suggestions;
- Requiring incorporation of traditional knowledge into decision making;
- Sharing information and studies with NVN in a meaningful and accessible way; and
- Outlining protocols for what happens if NVN and BLM disagree on a proposal, finding, or decision.

Through this framework we are hopeful that consultation processes are more meaningful and that our feedback is effectively incorporated into planning approvals and designs. These improvements will contribute greatly to ensuring our environmental justice.

2. Environmental Justice

Environmental justice, as defined by the Environmental Protection Agency, is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.¹ At the core of this definition is equal access to the decision-making process to have a healthy environment in which to live, learn, and work.² Currently, NVN is inundated with development proposals and planning exercises, including the Willow project's Master Development Plan EIS. NVN strives to be an active and engaged entity in these review processes, but the amount of planning and development currently underway in the region presents serious capacity challenges in our ability to have constructive and meaningful involvement.

As mentioned above, NVN also believes that moving forward with rewriting the IAP is premature in light of the uncertainties surrounding the impacts of development in the region. Specifically, the effects of GMT-1 and GMT-2, have not been realized and experienced by the community. How the construction and operation of these projects will impact the community and surrounding landscape is unknown. The effects of GMT-1 and GMT-2 on the region's subsistence resources and practices, and ecological and physical systems have not been truly analyzed and quantified because these disturbances are so new. Once a comprehensive review of how these projects have impacted the region's people and environment is complete, re-writing the existing (2013) IAP should be evaluated in light of these known effects.

3. Project and land management evaluation rubric

Since July of 2015, NVN has worked to incorporate a meaningful set of principles into our approach to environmental management and land use authorizations. We encourage BLM consider the IAP through NVN's Project and Land Management Evaluation Rubric (Rubric). NVN's Rubric asks whether the proposed project/land management approach has a negative impact upon the following:

- Ecosystems that support the flora and fauna considered to be traditional subsistence resources;
- Access to traditional subsistence resource areas;
- Health (physiological and psychological) and safety of Tribal members;
- Traditional cultural practices of Tribal members.

Through the IAP process, we encourage BLM to comprehensively examine how these values may be impacted by oil exploration and development in the region. We also encourage BLM to review the social and ecological systems that connect many of these values.

¹ United States Environmental Protection Agency, Environmental Justice. Accessed September 27, 2016. Available at: <https://www.epa.gov/environmentaljustice>.

² *Id.*

Additionally, NVN considers projects and land-management from the perspective of a landscape-scale which means that cumulative impacts are also a primary concern. As such, we strongly encourage BLM to use a true landscape-level analysis to conduct a comprehensive and meaningful cumulative effects analysis of oil and gas related activities, including exploration activities, for this plan. A meaningful cumulative effects analysis will reveal the true impacts that oil exploration and development has already had on the community and our traditionally used lands.

4. Subsistence

As discussed above, NVN is the local entity charged with protecting subsistence resources and practices. We take this responsibility seriously and encourage BLM to carry out a robust analysis of how changes in leasing, and the cumulative effects of development in the region, have impacted subsistence resources and practices. This analysis should include an examination of how traditional subsistence use areas have been lost, how subsistence resource availability has been diminished and/or altered, and how access to subsistence resources has changed. Additionally, how these changes in subsistence resources and practices have affected the community's social and cultural systems and health should also be reviewed.

The effects of exploration and development on Native allotments also needs to be thoroughly examined in the IAP. Native allotments were largely selected based on their proximity to abundant subsistence resources; and noise and other industrial activities are impacting subsistence resources and residents' subsistence practices in the region. These impacts are affecting the availability of resources that have traditionally been harvested at or near certain Native allotments. These impacts are harming individuals use of these areas and compromising the value of individually selected lands.

As this plan moves forward, we encourage BLM to conduct a robust analysis under Section VIII of the Alaska National Interest Lands Conservation Act (ANILCA). We also encourage BLM to incorporate the Northeast NPR-A Regional Mitigation Strategy into the final document as a way to offset and compensate for unavoidable impacts to subsistence from development.

a. Subsistence Use Areas

We are extremely concerned about the loss of our irreplaceable subsistence use areas. These traditional lands have already been significantly compromised by oil and gas activities and infrastructure. The cumulative amount of leased lands within our traditional subsistence use area should be quantified within this analysis and publicly disclosed. No additional leasing should be allowed in areas that are currently closed to leasing, and specific areas on the landscape should also be identified for their subsistence values and protected.

The Kuukpik (Colville) River Special Area is one of the few remaining places that we can travel for subsistence resources that is not significantly impacted by development. This waterway and all surrounding lands should remain free of oil exploration and development. Similarly, Fish Creek has incredible subsistence importance to our community and should be protected.

b. Subsistence Resources

The IAP must consider leasing and development impacts to all of our subsistence resources. This analysis should include terrestrial, freshwater, and marine resources. Areas of life cycle importance must remain off-limits to development. Considerable attention should be paid to the Teshekpuk Caribou Herd. For these animals, migration corridors (particularly areas near our community), calving grounds, overwintering areas, and important foraging locations must be protected.

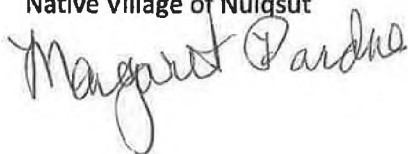
5. Human Health

The cumulative effects of oil and gas activities within our region warrants a comprehensive review of human health. A thorough and complete Health Impact Assessment (HIA) should be completed as part of this new IAP. Past IAPs, including the plan that was completed in 2008, included a formal HIA. This document must involve a systems approach to the determinants of health and involve a specific analysis of pollution, food security, and nutrition. A comprehensive air quality assessment must also be completed as part of this planning effort to determine how increased leasing, exploration, and development will further contribute to regional air quality problems.

Thank you for considering these comments. Please let us know if you have any questions and we look forward to working with you over the course of this process.

Respectfully,

Native Village of Nuiqsut

A handwritten signature in black ink, appearing to read "Margaret Pardo", written over the typed name.