

IÑUPIAT COMMUNITY of the ARCTIC SLOPE

an IRA Regional Tribal Government



P.O. Box 934 • Barrow, Alaska 99723

Ph: (907) 852-4227 1-888-788-4227 Fax: (907) 852-4246

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NPR-A Planning Team
Bureau of Land Management, Alaska
State Office, (931), 222 W. 7th Ave.
Anchorage, Alaska 99513-7599

James Patkotak, Natural Resources Director
Inupiat Community of the Arctic Slope
P.O. Box 934
Barrow, Alaska 99723

NPR-A Planning Team & Mr. Henry Bisson:

1 The Inupiat Community of the Arctic Slope (ICAS) is a federally recognized Regional Tribal Government, advocating for the membership within the Arctic Slope "Borough" in the State of Alaska, and having a common bond of association and interest' including Pt. Hope, Pt. Lay, Wainwright, Barrow, Nuiqsut, Kaktovik, Anaktuvuk Pass & Atqasuk, and in order to promote our security & social welfare, and advance and protect our common interests' as the descendants of the aboriginal Inupiat within the area, I will comment on the proposed amendment to the Integrated Plan for the Northeast NPR-A established in 1998, on behalf of the ICAS membership.

Comment on NE NPR-A:

2 The protection of the proposed region's subsistence resources and environment has to be our number one concern when this type of action comes up which involves our traditional & cultural lifestyle that may be impacted by oil and gas development on our subsistence and land-use areas on the Arctic Slope.

003 Birds
4 The area that is being considered, is identified as a sensitive area which requires heightened protection from potential impacts of oil & gas development and operation, especially the endangered waterfowl that nest, molt, and rear their young in the area that is being considered for leasing in the future: Stellars, Spectacled Eider, Oldsquaw ducks. The geese species that inhabit the Teshekpuk Lake that also nest, molt and rear their young in the area will be impacted by an oil and gas development. The NE NPR-A area has a variety of fish that the Inupiat have subsisted on for decades for their nutritional needs, harvesting them out of the rivers, streams, and lakes. The Arctic Cisco is of a concern to us, being that it is becoming scarce to catch in the nets of fishermen, since oil and gas development has occurred along the Continental Shelf of the Arctic Slope stretching from the vicinity of Barrow to the Demarcation Point despite our protests' against development. In addition, all lakes with drainages into Teshekpuk Lake are considered spawning areas for grayling, white fish and other species in which deep lakes are the wintering sites for the Arctic Slope fish-stock. With oil & gas exploratory & drilling activities on our subsistence land-use areas, our way of life is being threatened as these are our dietary & nutritional supplements.

005 Seismic
All around the vicinity of Teshekpuk Lake, subsistence activities that occur during the winter season could be affected by seismic or drilling exploration activities. Such as, impacts to fur-bearing trapping & hunting routes, fishing, and the opportune hunting timeframe for many types of mammals that are harvested by the Inupiat in the area of the NE-NPR-A. The deep ruts left in the snow by seismic vehicles creates difficult terrain to traverse, and results in snowmobile wear and tear, including the sleds being pulled behind them.

006
Cumulative

The lack of information in regards to the social and cultural impacts, which are termed as "cumulative impacts"⁷ is also a concern for our villages within the North Slope. There are cumulative impacts that have occurred since oil and gas development began on the North Slope thirty years ago. With oil and gas development encroaching closer to the villages, this is a valid concern that needs to be addressed by the United States Government, Bureau of Land Management, since it is for the welfare of the Inupiat residents of the North Slope who are United States Citizens. We are the citizens of the United States that have endured to date, the impacts that have already occurred, and with new development being discussed, we would bear the brunt of this new development also. The quote that was given in the report of the National Research Council follows: "There is a particular need for attention to the social and cultural efforts of leasing, exploration, development and production", including the gradual or long term changes that can be expected to take place even in the absence of spills...as well as the broader range of socio-cultural disruptions that can result from a spill and persist for years. And as a corollary, not enough effort has been devoted to the pragmatic question of what steps, if any, could be taken to avoid or lessen harmful consequences."

007
Impact
Comp.

In case the Western Arctic Caribou Herd or the Teshekpuk Herd population declines due to development on NPR-A, the Department of the Interior shall fund a reindeer/caribou husbandry program through the Regional Tribal Government (ICAS), for Barrow, Wainwright, Atkasuk & Nuiqsut.

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As being land-stewards, camp & cabin owners, subsistence harvesters, and the permanent residents of the North Slope, who will still remain here after development has come and gone in the NPR-A, we prefer the "No Action Alternative Plan".

Thank you for this opportunity to comment on the proposed amendment to the NPR-A Integrated ~~Plan~~.

Cc: ICAS Executive Board of Directors (12)
ICAS Executive Director, Janice Meadows
North Slope Borough Wildlife Management Director: Charles D. Brower

