



City of Nuiqsut

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June 15, 2016

Stacie McIntosh
Arctic Field Office
1150 University Ave.
Fairbanks, AK
Via email: s05mcint@blm.gov

RE: City of Nuiqsut RMS Comments

Dear Ms. McIntosh:

The City of Nuiqsut wishes to thank the United States Department of the Interior Bureau of Land Management (BLM) for the opportunity to comment on the GMT1 RMS process and approach to that process to this point in time.

The City's specific comments are listed below:

- 1) Per the GMT1 Record of Decision issued by Secretary Jewell, this RMS is intended to deal with framework for mitigation measures in response to future development with the Northeast NPR-A made possible by the existence of GMT1. The region is by definition with the backyard of our community, and therefore Nuiqsut is clearly the community most impacted by this RMS. As a result, we feel that the Nuiqsut community should have the greatest weight in influencing final BLM NE NPR-A RMS decisions.
- 2) While the City of Nuiqsut is a member of the Trilateral Group that deals with crucial community issues, and stands by the decisions of the group; each leadership entity with membership has its own specific mission, goals and objectives.

The City of Nuiqsut represents the municipal government of Nuiqsut, and as such provides, among other resources to the community, the venue (Kisik Community Center) where most all industry-related meetings are held for the community. To provide this venue requires administrative support from our City staff to help schedule, set up,

complete applications necessary to satisfy our liability insurance requirements, set-up the meeting room for these events, and provide clean-up services afterward. The frequency of meetings related to development is so large already, and considering use of the Kisik Center will likely increase in direct response to future projects within the Northeast NPR-A due to BLM-led mitigation processes, the burden we experience as a result will be unsustainable without financial support.

With an administrative capacity already stretched to its limits, and with our FY17 NPR-A Impact Mitigation funds slashed by 50% from what was promised by the State for the third consecutive year, the municipal government is forced to operate on a shoe-string; despite the fact that much of the recent NPR-A Impact Mitigation pool funds originate from CD-5 royalties that represent production in our own backyard – an operation clearly visible from the city streets in Nuiqsut.

Given that the State of Alaska clearly favors funding municipal government operations of Barrow over Nuiqsut - despite that development is occurring within the Northeast NPR-A within clear eyesight of Nuiqsut - there must be a component of the RMS that provides operational resources for the municipal government to continue or it will collapse. The local municipality must be able to participate in the mitigation objectives identified in the GMT1 RMS, or the entire RMS will be a failure.

3) The City of Nuiqsut is really unclear about the intended path of BLM and BLM-contracted planners are taking at this point. After attending three RMS Workshops, we still do not have any idea of the philosophy by which design of the RMS will be approached. For this reason it is very difficult for us to comment specifically at this time, and we would respectfully request an extension of the comment period until we can gain a better idea of where BLM is headed with the RMS.

In short, we find the lack of specificity in the Draft *Conceptual Regional Mitigation Strategy Document for the Northeastern Region of the National Petroleum Reserve in Alaska* published on April 15, 2016, prohibitive for us to enable detailed comments.

We are already well aware of the major unavoidable impacts on resource development, and are also aware of the economic advantages to the local community that development provides. However, we are becoming a bit leery that some of the promised advantage of economic development for our community will really take place given that royalties from CD-5, the first development project within the bounds of NPR-A, have not positively impacted on our community in evidence by our FY17 NPR-A Impact Mitigation funds being slashed by 50%.

We can only hope that this situation will improve in the future, because a viable municipal government is required to mitigate the impacts of oil and gas development; and as it stands now, we have no resources to do so. We believe that it is crucial that be addressed and factored into any RMS decisions that are made.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Arnold', written in a cursive style.

David L. Arnold, Ph.D.
Nuiqsut City Administrator

For and with the permission of:

Honorable Thomas Napageak, Jr.
Mayor, City of Nuiqsut