

North Slope Borough

OFFICE OF THE MAYOR

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Michael Aamodt, Mayor

Stacie McIntosh
BLM Arctic Field Office
1150 University Avenue
P.O. Box 35005
Fairbanks, AK 99709-3844

RE: BLM NPRA REGIONAL MITIGATION STRATEGY

Dear Ms. McIntosh:

The North Slope Borough (Borough) writes to express its concerns with the Bureau of Land Management's (BLM) process and self-imposed timeline for the implementation of the proposed Regional Mitigation Strategy (RMS).

Because of the continuing confusion and lack of meaningful opportunities for collaboration between North Slope stakeholders and because of the level of review that the RMS requires, the Borough respectfully requests that BLM extend the existing comment period of the RMS at least 45 days. Many North Slope residents have been occupied with spring whaling and subsistence activities that have precluded them from participating in National Petroleum Reserve Alaska Working Group (NPRA Working Group, Working Group) meetings and from reviewing the conceptual RMS document. At the last RMS workshop in Fairbanks, the Borough requested a lengthier review period specifically because the Borough recognized the difficulty in scheduling meetings and conducting stakeholder outreach during this busy subsistence season.

In April, the North Slope Borough along with NPRA Working Group members made a request at the Working Group meeting that BLM organize a meeting in Nuiqsut where Working Group members could engage with each other and the local community in building consensus on key elements of the conceptual RMS document. The BLM did not inform the Borough or the Working Group of its inability to schedule the requested meeting until the May Working Group meeting. This did not leave enough time for Working Group members to organize a meeting of their own. The Borough believes that it is imperative that the BLM exercise its discretion in granting a lengthier period of review for the conceptual RMS document to allow such a meeting to take place.

Further, this requested extension should not interfere with BLM's ability to issue a Notice of Intent (NOI) for the Greater Mooses Tooth 2 (GMT2) Supplemental Environmental Impact Statement (SEIS). Instead, local stakeholders such as the Borough and the NPRA Working Group would be able to provide better information to enable BLM to incorporate the perspective of local people into that process. All stakeholders will benefit by ensuring that the RMS process is conducted in a manner that promotes local buy-in and support.

The Borough also requests that BLM protect the integrity of comments received from North Slope stakeholders throughout this process. BLM should weigh comments received from all North Slope stakeholders, especially the NPRA Working Group, carefully. This proposed RMS has the ability to have significant impacts on local communities and people. The BLM must allow North Slope stakeholders to shape this policy to ensure that local communities are benefitted rather than burdened by yet another layer of federal action.

The North Slope Borough is confident that you will consider the wishes of North Slope stakeholders and fully consider our request. Thank you for your time and efforts.

Sincerely,



Michael Aamodt, Mayor
North Slope Borough