

June 15, 2016

Stacie McIntosh  
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P.O. Box 35005  
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Molly Cobbs  
Regional Mitigation Strategy Coordinator  
BLM Alaska State Offices  
222 West 7<sup>th</sup> Avenue, #13  
Anchorage, Alaska 99513

RE: BLM NPRA REGIONAL MITIGATION STRATEGY

Submitted via email to: [s05mcint@blm.gov](mailto:s05mcint@blm.gov) and [mcobbs@blm.gov](mailto:mcobbs@blm.gov)

Dear Ms. McIntosh and Cobbs:

The National Petroleum Reserve- Alaska Working Group (NPRA WG, Working Group) 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).

#### NPRA Working Group

The Working Group was formed by Secretary Salazar as part of the 2013 Record of Decision for the NPRA Integrated Activity Plan and Environmental Impact Statement (NPRA IAP/EIS). At that time, North Slope stakeholders were concerned about the strong influence that various special interest groups exerted throughout the development of the NPRA IAP/EIS and the adoption of the B-2 Alternative by BLM. Concerns were also raised to the Department of the Interior that the traditional National Environmental Policy Act process was insufficient to allow for meaningful and regular consultation by local stakeholders on NPRA management decisions.

Working Group members saw the formation of the NPRA WG as an important first step to improved communication and information sharing between BLM and North Slope stakeholders and as a powerful mechanism to promote local influence on BLM management decisions that impact the region. Regrettably, BLM's RMS development process has rekindled the Working Group's historic concerns.

#### Regional Mitigation Strategy

The Working Group is greatly appreciative of the efforts that BLM has made to date to engage local stakeholders in the Regional Mitigation Strategy- particularly stakeholders that represent the village of Nuiqsut. However, BLM's self-imposed deadline for finalizing the RMS by the end of 2016 and BLM's limitation of the amount of time available for local stakeholders to review and provide feedback on the Conceptual RMS Document (C-RMS), leads the Working Group to believe that the

process of developing the RMS is being forced upon Working Group members with little regard for meaningful or constructive local collaboration.

During RMS workshops and Working Group meetings, NPRA WG members have repeatedly stated that very little understanding or comprehension of what the ultimate goal of the RMS is intended to be exists among the North Slope participants. This is particularly evident when discussing the kinds of unavoidable adverse environmental and sociocultural impacts of development that the RMS is supposed to address as a roadmap to mitigate those impacts. In fact, many Working Group members have expressed deep concerns about the BLM's attempt to monetize losses to subsistence resources and culture.

Instead of resolving or clarifying these concerns, the RMS workshops have only further muddled the NPRA WG's understanding of the intent and goals of the RMS. And because of the delays between workshops and the release, receipt and format of meeting materials, and the difficulty for some members to travel to workshops or attend other meetings, it has been very difficult for Working Group members to communicate RMS concepts back to their representative organizations for further review and comment. These issues have also impacted Working Group members' ability to articulately express concerns and comments during the workshops. This complicated process does not allow for meaningful contributions to the RMS by the WG or other North Slope stakeholders and puts the local people at a disadvantage for shaping this process.

At the last RMS workshop in Fairbanks, Working Group members asked for a minimum of six months to review the C-RMS so that local stakeholders could properly decipher and digest all of the workshop materials and notes provided to date. It was the NPRA WG's intent to work collaboratively amongst members during that period of time to identify issues and propose amendments to C-RMS language, concepts, etc., to ensure that local input is accurately documented and reflected in RMS language- a need particularly acute because of the intense participation by environmental non-governmental organizations and other outside entities throughout the RMS process. Instead, BLM granted a 45-day review window during a period of time when the vast majority of Working Group members were occupied with whaling and other important subsistence activities and had limited availability to review the C-RMS.

In the April NPRA WG meeting, members requested that BLM organize a meeting in Nuiqsut so that local stakeholders could have an opportunity to discuss the C-RMS and work together to provide meaningful input. BLM representatives noted the request but didn't inform the NPRA-WG until the May meeting that organizing the requested meeting was impossible.

Consequently, the NPRA WG believes that the RMS process and timeline to date is inapposite with the stated goals of the RMS and the intent behind the formation of the Working Group. Many parts of the RMS have dynamic variables that are

complicated to identify (e.g., values and functions that warrant mitigation) or monetize (e.g., loss of subsistence hunting areas). If local stakeholders are not given more opportunities to comprehend and address these critical components of the RMS, then the overall RMS process is little more than a charade when it comes to local consultation and input.

At a minimum, the NPRA WG respectfully requests that the comment period for the C-RMS be extended until an in-person Working Group RMS workshop can be conducted in Nuiqsut and WG members have more opportunity to solicit feedback and comments from their respective organizations. In addition, the Working Group requests a minimum of 45 days to review the draft RMS once released. The current comment period does not allow sufficient time for the WG and other North Slope stakeholders to adequately review the materials, to inform our various organizations, or to provide meaningful opportunity to articulate our concerns or support. Without local support, the RMS could become contentious amongst our communities- especially those communities within the NPRA. The Working Group believes that additional time is needed for community buy-in from NPRA communities and stakeholders. The Working Group requests that BLM grant the extension we have recommended in order to preserve the integrity of local collaboration in this process.

The NPRA WG takes its role and responsibility in the RMS process seriously and the Working Group hopes that BLM will not treat the participation of the Working Group lightly. It is not the intent of the Working Group to needlessly delay the RMS process or be disruptive, rather it is out of a sincere desire to contribute meaningfully and to garner community support behind the RMS that the NPRA WG makes these requests. The Working Group shares BLM's goal to see the RMS used as a successful model for other regions in Alaska and the U.S.

The NPRA WG is confident that you will consider the wishes of North Slope leaders and fully consider our proposal. Thank you for your time and efforts.

Sincerely,



Crawford Patkotak  
Co-Chair – NPRA WG



John Hopson, Jr.  
Co-Chair – NPRA WG

Cc: Bud Cribley, BLM Alaska of State Director  
Neil Kornze, BLM Director  
Arctic Slope Regional Corporation  
North Slope Borough

Iñupiat Community of the Arctic Slope  
City of Barrow  
Native Village of Barrow  
Ukpeagvik Inupiat Corporation  
Olgoonik Corporation  
Wainwright Traditional Council  
City of Atqasuk  
Native Village of Atqasuk  
Atqasuk Corporation  
Kuukpik Corporation  
City of Nuiqsut  
Native Village of Nuiqsut  
Tikigaq Corporation  
Native Village Point Hope  
City of Anaktuvuk Pass  
Nunamiut Corporation  
Naqragmiut Tribal Council  
Native Village of Kaktovik  
City of Kaktovik  
Kaktovik Iñupiat Corporation  
Cully Corporation  
Native Village of Point Lay