



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL]

Matthew Rexford <nvkaktovik@gmail.com>
To: blm_ak_coastalplain_EIS@blm.gov

Tue, Jun 19, 2018 at 6:42 PM

June 19, 2018

Bureau of Land Management

Attn: Coastal Plain Oil and Gas Leasing Program EIS

[222 West 7th Ave.](#), Stop #13

Anchorage, Alaska 99513

Submitted via blm_ak_coastalplain_EIS@blm.gov

RE: ANWR Plain EIS Public Scoping Comments

To whom it may concern,

This letter serves as the comments from the Native Village of Kaktovik on the Bureau of Land Management's Notice of Intent to prepare an Environmental Impact Statement for oil and gas leasing in the Coastal Plain of the Arctic National Wildlife Refuge (ANWR), also known as the 1002 Area.

The Native Village of Kaktovik, or "NVK", is the Tribal entity for the community of Kaktovik, the only community within the Coastal Plain or the broader ANWR. As the only community within the area proposed for leasing, NVK, Kaktovik, and the Kaktovikmiut (people of Kaktovik) will be the most directly impacted by proposed leasing activities in the Coastal Plain, both positively and negatively. Because of this direct impact, BLM must work closely with NVK throughout the National Environmental Policy Act, or "NEPA", process and through government-to-government consultation which NVK is participating in. NVK is also a cooperating agency on the Coastal Plain EIS.

As the only North Slope community located within ANWR, Kaktovik has long felt the strain of a stifled economy and access issues related to Fish and Wildlife Service's, or "FWS", management of the refuge.

Though we have voiced these concerns throughout the years, we feel we have not been heard in the past and the management of the Coastal Plain and ANWR has barely included us, the people who actually live here. For these reasons, NVK joined Voice of the Arctic Inupiat, or "VOICE", in advocating for the opening of ANWR for leasing.

NVK supports leasing that occurs in an environmentally responsible and culturally sensitive manner because of the economic benefits leasing will provide our local community, along with the improved access from leasing and the social and cultural outcomes of leasing. In general, we have seen how responsible resource development has benefited the North Slope and we are eager for Kaktovik and the Kaktovikmiut to see these benefits more directly from leasing in the 1002 Area. NVK feels strongly that through coordination with the local people leasing can occur with minimal impact to the local community, environment, wildlife, subsistence, and the cultural resources within the 1002 Area, and with maximum benefit to the

Kaktovikmiut. It is with deep care for our home and the Kaktovikmiut that we support leasing in the Coastal Plain and signed on to the VOICE resolution supporting leasing in the 1002 Area.

During BLM's analysis, NVK encourages BLM to assess the many positive impacts from leasing in the 1002 Area, specifically to the Kaktovikmiut. However, leasing must be done carefully and with special attention to any potential impacts. Of these, NVK makes the following recommendations:

Carefully assess impacts to wildlife, the environment, and subsistence from leasing.

The 1002 Area is not only home to the Kaktovikmiut, but is teeming with life that the Kaktovikmiut rely on to survive. For generations we have relied on the diverse wildlife that inhabit the Coastal Plain and the abundant environment for sustenance and cultural welfare. We recognize that these resources must be preserved and are the priority with respect to leasing; however, just as we have seen across the North Slope, co-existence is possible and through avoidance, proactive mitigation, and robust analysis, impacts to our way of life, the wildlife, and environment can be minimized and avoided altogether. BLM should work with NVK and the Kaktovikmiut directly on identifying important subsistence resources and environmentally sensitive areas which should be withheld from leasing and where set-backs would be appropriate. Historic mitigation measures like pipeline height, road set-backs, subsistence advisers, and other wildlife and subsistence mitigation measures should all be assessed and incorporated into leasing in ANWR if appropriate. Our elders and the North Slope Borough have all worked hard to make sure many impacts are addressed proactively in development across the North Slope and we expect this high standard to continue in the 1002 Area.

Be attentive to cultural resources in the 1002 Area, work with the Kaktovikmiut in identifying these resources, and apply the appropriate setbacks.

BLM should work with the Kaktovikmiut to identify the cultural resources in the 1002 Area which should be set aside or avoided for leasing. Many of these are ancestral grounds, camps, and allotments which should not be available for leasing. Set-backs have been successfully used in other areas of development, and BLM should work with the community on how these resources can be preserved. During our government-to-government consultation, NVK provided BLM with some information on cultural resource, subsistence use areas, and important corridors in the 1002 Area which NVK hopes to discuss more with BLM on how these areas should be managed and avoided with respect to leasing.

Conduct a village health assessment for the community of Kaktovik.

A village health assessment should be part of BLM's Leasing EIS in order to gather baseline health information from the community of Kaktovik. It is important for NVK and the people of Kaktovik to have an understanding of our community welfare prior to the onset of leasing. BLM should work with the North Slope Borough on data that may be available and work with the local community on how to ensure a comprehensive assessment is conducted.

Address local access in the Leasing EIS and in BLM's management of the Coastal Plain.

Over the years, NVK and the Kaktovikmiut have frequently raised to the Federal government the lack of access we have to the 1002 Area and ANWR. While our ancestors roamed throughout this region, the Federal government and FWS has restricted our people to Barter Island and limited our access even to our own Native Allotments. We expect that as the new manager of the Coastal Plain, BLM will examine how local access has been handled in the past and how this impact to the Kaktovikmiut can be alleviated. Current restrictions which BLM should consider are: ATV use in the Coastal Plain, year-round access to Native Allotments in the Coastal Plain and the Wildlife Refuge, future road access, and local infrastructure and energy development. BLM should look for ways on how BLM can address local access issues during the Leasing EIS and through other mechanisms. Since the 1002 Area is now available for oil and gas leasing, industry should not have greater access to our region than the Kaktovikmiut. NVK considers local access a priority for BLM to address in the Leasing EIS.

Provide a mechanism for impact aid from future leasing activities.

BLM should address impact aid for the community of Kaktovik from leasing and subsequent activities.

Impact aid has been included in previous attempts to open ANWR for leasing, but was left out of the 2017 Tax Act. Impact aid must be addressed by BLM and NVK supports VOICE's comments with respect to how impact aid should be applied. Specifically, impact aid should be coordinated through a local coordination office established in Kaktovik, funding should be allocated for monitoring and mitigation to be directed by the local community, and BLM should set aside funding for mitigation projects and program to address local needs—including social programs, subsistence impacts, compensation from impacts, local infrastructure development, and other community initiatives. Impact aid has been used in other areas across the North Slope to address local impacts from resource development activities and should be included as part of leasing in the Coastal Plain. NVK sees impact aid as an essential mechanism to balance the potential negative impacts from resource development and as a mechanism to enhance our community. The local community must have the resources to build our capacity, to address any local impacts, and to benefit from resource development occurring in our backyard; these mechanisms are not currently in place and need to be established.

Integrate the Kaktovikmiut more completely into management of the Coastal Plain through a co-management or similar mechanism.

The Kaktovikmiut should be integral to BLM's process and management of the 1002 Area. Prior to leasing, BLM should read "In This Place: A Guide for Those Who Would Work in the Country of the Kaktovikmiut" and include this guide in their Leasing EIS. The input, expertise, and local knowledge of the Kaktovikmiut must be fully incorporated into the Leasing EIS and BLM's management of the Coastal Plain—the Kaktovikmiut are the local experts of the Coastal Plain and have the greatest interest in responsible resource development, our local knowledge should be invaluable to BLM. Traditional Knowledge from community members should be weighed heavily in the Leasing EIS and our local expertise should be sought out for any environmental or wildlife study in the 1002 Area. While NVK is participating in the Leasing EIS through government-to-government consultation and as a cooperating agency, we understand that BLM's management of the Coastal Plain goes beyond this NEPA process. NVK and the Kaktovikmiut need to be completely integrated into BLM's management of the Coastal Plain. As the only community within the Coastal Plain and a Tribal entity, NVK has sovereignty and should have a co-management agreement with BLM and/or FWS in the management of the Coastal Plain. We feel co-management of ANWR is in line with BLM and FWS's responsibilities and will address many of the local concerns we have raised in this letter.

In conclusion, NVK supports BLM's NEPA process and future leasing in the Coastal Plain EIS. We understand that responsible resource development can and does occur because we have seen it across the North Slope; however, it must be done carefully and through coordination with the local people. Leasing in the 1002 Area holds many opportunities for the Kaktovikmiut, including an opportunity for BLM to address the longstanding issues which the local people have raised. We expect to continue to work closely with BLM throughout this process to identify special areas, setbacks, mitigation measures, and lease stipulations in the 1002 Area.

Sincerely,

Edward Rexford, Sr.

President, Native Village of Kaktovik

Cc: Steve Wackowski, Special Advisor to Secretary of Interior on Alaska Affairs

Senator Lisa Murkowski

Senator Dan Sullivan

Congressman Don Young

President, Kaktovik Iñupiat Corporation

Mayor Brower, North Slope Borough

Voice of the Arctic Iñupiat