

DNR - Mining, Land & Water Online Public Comment

North Slope Management Plan

Topic: Public Scoping Comments for North Slope Management Plan

Filtered for:

Comment 1 of 21 - submitted on 05/06/2015 at 12:00 AM:

I would like to see the State of Alaska pursue the conveyance of mining ground directly outside the PLO inner corridor to the state. Myself and many local miners have not been able to get a permit approved by the BLM for many years and are not mining. I hold claims on the upper end of Nolan creek. The BLM has told me they won't permit me mining them. If the land were conveyed to the state I could get a permit from the DNR and be mining in a month. Please bring this up in the meeting, read my E-mail if you want to and forward my E-mail to whoever works on conveyance and get land with minerals and gold that's accessible conveyed to the State.

Thank you

Comment 2 of 21 - submitted on 07/31/2015 at 12:00 AM:

The North Slope Borough (Borough or NSB) appreciates this opportunity to participate in the Department of Natural Resources' (DNR) Scoping Process for the North Slope Borough Management Plan and provide comments on how the area should be managed.

The DNR initiated a planning process for the development of the North Slope Management Plan early in 2015. The plan encompasses approximately 12 million acres of land and water in the area of Prudhoe Bay, south to the Chandalar area and includes the submerged lands to a 3 mile nautical limit from the Canadian border to Icy Cape.(1) DNR held meetings to obtain public input on use, resources and issues within the area in Barrow, Anchorage, Anaktuvuk Pass, Kaktovik, Nuiqsut, Wiseman/Coldfoot and Fairbanks.

The Borough has actively participated and appreciates the approach that has been taken concerning the development of the plan.

About the North Slope Borough

The North Slope Borough is the regional municipal government for eight communities across the North Slope of Alaska. The Borough is the largest municipality in the United States in terms of landmass. It is the regional government for the eight villages within the 89,000 square miles of the Alaskan Arctic, north of the Brooks Mountain Range to the Arctic Ocean. The 2011 populations of our villages ranged from under 300 in Pt. Lay to just over 4,800 in Barrow, the seat of our Borough government and the northernmost community in the country. In total, the Borough has approximately 7,840 residents, of which nearly 70 percent are Inupiat. Five of our communities are located directly on the arctic coast, while the residents of a sixth, Nuiqsut, access the waters of the Beaufort Sea via the Colville River. Our villages are small and remote - accessible only by air, seasonal ice roads or barge. Severe weather often prevents travel in or out of the villages.

Our residents depend on subsistence resources for their physical and cultural health. Traditional foods are far more nutritious than many types of imported "store-bought" food, and their continued consumption has repeatedly been shown to be critical to the health of our people.(2) The social fabric of our communities revolves around subsistence traditions. All of our communities, whether through direct harvest or extensive sharing networks, utilize the full range of traditional marine subsistence resources that abound in arctic waters. Any threat to subsistence resources is a threat to the continued viability of our communities and the Inupiat culture.(3)

Factual History

At the time of the Borough's first selections, the Municipal Land Entitlement Act(4) entitled the Borough to select up to 10% of the State's general grant lands within the Borough's borders. The Borough's initial selection, made on May 29, 1973 (ADL 64646), was for a little more than 367 acres and included 25 of the 75 Deadhorse lease tracts. The selection was rejected by the State, and the Borough appealed unsuccessfully in *North Slope Borough v. LeResche*.(5)

The mid-1970s through the early 1980s saw the development of Deadhorse, including Service Area 10, the Borough's utility operations, and the construction of the Kuparuk Industrial Center (KIC). This development was essential to support oil production, which peaked in 1988.

In 1997, Cross Island (also a Beaufort Sea barrier island, ADL 414852) was conveyed to the North Slope Borough. The Preliminary Decision (PD) acknowledged at that time that there was no DNR land use plan for the area and that the subject property was classified Resource Management. The Division of Oil and Gas was noted to have originally objected to the proposed conveyance, but after further review withdrew its objection. At that time, Cross Island was the site of various exploration activities, including one or more oil and gas exploration wells. No concern was raised about potential revenue impacts to the State of Alaska associated with the Cross Island conveyance to the Borough. No concerns were raised in the PD about the island moving from the original 1974 Master Title Plat (MTP) as depicted by the Bureau of Land Management (BLM).

In 2002, the State reclassified and conveyed two parcels where the Service Area 10 Camp and Utilities are located.(6) The decision described the State's obligation to grant these parcels as follows:

All of the industrial lease tracts are a source of revenue to the State; however, the state has an obligation to fulfill the municipal entitlement given to the borough under AS 29.65.010. The purpose of the municipal entitlement is to create a source of revenue generation for qualifying municipalities. . . The economic benefit to the NSB is that it will have a land base as a whole from which to stimulate community development and economic growth within the borough.

In 2005 and 2006, DNR's decisions likewise included reclassification of previously classified land for conveyance to the Borough. Again, the statements included in the decision by DNR supported reclassification and conveyance.

DNR's 2007 conveyance of Chukchi Sea Barrier Islands (ADL's 414858 & 414859) also involved barrier islands that were not immediately conveyable.

Most recently, on February 12, 2015, DNR conveyed lands to the Borough under the Municipal Entitlement Act "subject to" existing oil and

gas leases when it conveyed Deadhorse lease tracts and the "Crazy Horse Pad" (ADL 28330).

Expectations from the Process

The role of state land use plans was established by AS § 38.04.005. It is the policy of the State of Alaska " ... to establish a balanced combination of land available for both public and private purposes. The choice of land best suited for public and private use shall be determined through the inventory, planning, and classification processes ... "

The plan determines management intent, land-use designations, and management guidelines that apply to all state lands in the planning area. The Borough anticipates this plan will be similar to the plans developed for the Northwest, Kenai, and Yukon Tanana areas. The Borough's interest in this process is not just related to how the state will manage its land, but also how the state will provide for the satisfaction of Municipal Land Selections by the Borough and how the Borough will coordinate our management efforts. Changing the old way of thinking is necessary to produce a long term management plan that will accommodate the Borough's interests and form a framework for resolving conflicting ideas about land use.

Although no area plan has been developed for this area, land that was owned by the Federal Government has been conveyed to Native organizations and the State of Alaska over the last 20 years. Several areas of federal land interest have not yet been resolved, but should be considered as part of this planning process. Land that was assumed to be state land is now either owned by the Borough or by Native organizations. Assumptions about how land will be managed are now more complex issues.

A Memorandum of Understanding has become a tool to better coordinate land management and permitting. The original estimate of North Slope oil and gas development and its ultimate life span have both increased substantially, as have the number of interested parties. Management of the oil and gas units has diversified beyond a very limited number of large companies to now include smaller and midsized companies that are not owners of the primary transportation infrastructure. The Borough's Oil and Gas Technical Report includes many recommendations and topics that should be considered as this process moves forward.(7)

Nearshore State Waters

The Borough is interested in learning how nearshore State waters management will be addressed in the Plan. Two critical areas of the Beaufort Sea have been traditionally considered off-limits for oil and gas leasing - the Barrow area due to its critical importance for subsistence whaling and its unique biological attributes associated with the Barrow Canyon and spring lead system, and the Kaktovik area due to its critical importance for subsistence whaling, the closure of adjacent federal lands, and a long-held, though now questioned, belief in its special importance as a bowhead whale feeding area. Additional areas in the mid-Beaufort near Cross Island have also seen permanent facility exclusion zones and seasonal activity restrictions. The Borough would like to know if these areas will continue to receive heightened protections for the benefit of subsistence users and biological resources as a more permanent element of this planning effort.

Areas of comparable significance exist in the Chukchi Sea nearshore region associated with lagoon systems and increasingly important walrus haul outs. This is outside of the North Slope Area Plan, but was not clearly identified in the Northwest Area Plan.

Material Source Sites

There is a need for the development of material source sites in a responsible manner, and the issue should be included in the Management Plan. Recently, both Brooks Range Petroleum and ConocoPhillips proposed new material sites in/near the Kuparuk Unit. The Borough Planning Department raised concern that it was unnecessary to develop two new material sites within a few miles of each other. This was supported by the provisions in Title 19 of the North Slope Borough Municipal Code (NSBMC). The Borough worked with ConocoPhillips and it eventually withdrew the proposed material site development plan and used an existing source.

The list of potential public gravel sources in the area is very limited and based on information that has not been thoroughly researched. The State is aware of the North Slope Borough's plans to develop, as demand dictates, three material sites in the Deadhorse area. PUT 23 is already under development with the northern area owned by the State of Alaska. The southern half of the pit is owned by the NSB. Roughly 5.5 million yards of material are available from this location, with the potential for about 1.5 million additional yards when expansion occurs into the two undeveloped areas of the north. The State has issued material sale contracts for several million yards from its side of the pit, but, to date, there are no material sale contracts issued in the southern portion. This is a viable source for immediate use.

The Deadhorse South and Mine Site 3 parcels have had geotechnical evaluation and show great potential for gravel development. The current estimate of saleable material from the two sites exceeds 20 million yards. Mine Site 3 is immediately north of the State Mine Site 102. Mine Site 102 is not mentioned as a potential source of material, nor are multiple additional material sites that DOT has developed or proposed in the north section of the Dalton Highway.

Other potential locations for gravel extraction in the Deadhorse area have been overlooked or ignored during recent evaluations of gravel availability. This is troubling when the need for gravel is so evident.

Material sites along the Dalton Highway corridor have historically been monopolized by DOT. Hundreds of gravel extraction sites have been opened and closed along the Dalton, generally in contradiction of the Borough Title 19 guidance. Although maintenance of the Dalton Highway is recognized as a top priority for gravel use in the corridor, it is the method of sourcing the material that has been a concern. Please see the map at the close of this letter for an indication of the extent of these AKDOT material sites.

The Borough has stated its concern for excessive, single use gravel sites in the past. The Borough would eventually like to see a plan for regional material sites that can satisfy everyone's needs, but minimizes the overall impact. This should be considered in the Area Plan.

Furthermore, the Borough understands the benefit of economies of scale in developing a material site. It is a recurring theme in our comments related to DOT mine site development. The Borough feels strongly that fewer material sites should be developed and they should be large and multi-year in their operational plans. The Borough supports regional mining and minimizing small, one-off projects since they violate the standards set forth in Title 19 of the NSBMC.

Coastal Management Plan Guidance

Although Alaska is no longer a participant in the National Coastal Zone Management Program, the Borough has codified the Coastal Zone

Policies and guidance that were the heart of its formerly state-approved local district plan in the NSBMC. It is important to determine how the State is going to work with the Borough to achieve the intended results of these policies and coordinate permitting and land management absent the directives of the defunct Alaska Zone Management Program.

Previously recognized Buffer, Conservation, Geophysical Hazard, and Gravel Areas may be helpful to review. The originally proposed Land/Water Use Plan from the Borough's Coastal Management Plan includes helpful historical information and guidance.

In other words, the Borough wants to understand how the North Slope Area Plan will address issues that are otherwise addressed in the NSBMC related to planning and zoning powers of the Borough such as buffers, easements and setbacks. Other Area Plans still contain references to consistency with the Alaska Coastal Management Program or a particular local Coastal District Plan regarding consistency reviews. In the absence of the State's participation in the national program, the Borough wants to know how these issues will be addressed, and what deference will be afforded NSBMC provisions.

Preliminary Municipal Land Entitlement Decisions

Several previous Municipal Land Entitlement decisions (including PD's that never were finalized) have established what the Borough considers precedent. For example, Barrier Island conveyance, Preliminary approval for conveyance of development nodes, gravel site and utility site priorities have been addressed.

The Dalton Highway Master Plan contemplated sites like Happy Valley, Franklin Bluff and other for partial conveyance to the Borough. The need to have more services at these sites beyond road maintenance facilities was highlighted. This document and its recommendations should be considered again.

Conflict with Mineral Leases

In developing this management plan, the State must consider how mineral leases will be handled. The State has argued in previous Municipal Entitlement decisions that the State's continued control of the surface estate materially lessens a possible conflict with mineral leases. This argument is unfounded.

The Borough receives the bulk of its revenue from oil and gas infrastructure located throughout the North Slope in the form of property taxes. Consequently, the Borough does not view itself as an adversary to mineral lessees. In fact, many activities undertaken by the Borough facilitate continued oil and gas development. For example:

- (a) The Borough has aligned with both the State and industry and is currently undertaking litigation involving the listing of several endangered species under the Endangered Species Act (ESA) not only because Borough staff biologists believe these species to be healthy, but also because ESA listing adds both delay and costs to potential development;
- (b) The Borough has created a streamlined gravel sales ordinance so that soon we will be able to sell gravel to industry in order to assist in development. The four gravel sites that were conveyed by the State through the Municipal land Entitlement process in 2010 (PUT 23, Mine Site F, Mine Site 3 and Deadhorse South) have each had Borough initiated geotechnical evaluation for mining potential, feasibility studies for economic development, and interest from the oil industry for development. The selection process for an operator for the Mine Site F location is underway currently;
- (c) The Borough is in the process of constructing Phase 1 of the Oxbow Landfill Expansion at Prudhoe Bay so more industry generated waste can be accommodated. The customer base is almost exclusively oil companies and the oilfield service industry that supports their work. As the only industrial landfill on the North Slope, Oxbow was nearly at capacity just a few years ago. Expansion efforts are underway for the landfill on land acquired during the last land conveyance decision. The Borough is able to minimize disposal costs, thus encouraging responsible waste management. This saves developers the expense of transporting solid wastes to another landfill far outside of the Deadhorse area.
- (d) The Borough is currently completing construction of the new Prudhoe Bay Waste Water Treatment Plant so that better facilities exist to accept industry-generated sewage and grey water. The Borough has committed nearly \$100 million dollars to develop this new water/wastewater plant which will service the utility needs of its oil industry customers in Deadhorse;
- (e) The Borough works closely with industry to ensure a streamlined and smooth path forward for Borough-issued industry permitting; and
- (f) The Borough has renewed land leases in Deadhorse and has performed necessary work to acquire appraisals of the properties and establish fair market rates for industry leases assumed from the State.

Placement of Facilities

In considering Municipal Land Entitlements that will be determined by the Plan, the State has previously argued that the retention of the surface estate would ensure that the placement of facilities could occur and that such placement would be consistent with the State's long term management objectives for the oil field. State statutes address this concern by mandating surface entrance and access to parcels with oil and gas resources, regardless of the surface owner.

Additionally, oil and gas extraction technology has improved immensely over the past forty years. In 1970, a sixty-five acre gravel pad drill site could access an area of approximately three square miles subsurface (assuming a 5,000 ft. drilling radius). In 1999, a thirteen acre gravel pad drill site could access a subsurface area of almost fifty square miles (assuming up to a 20,000 ft. drilling radius).⁽⁸⁾ Such an area is coincidentally about the same size as the 10,240 acre parcel near Nuiqsut that is part of the Borough's requested land selections. Therefore, with today's new technology, surface use issues are entirely irrelevant to producing hydrocarbons immediately under an entire area. The Borough believes that current oil and gas industry technological advancements have significantly reduced the potential surface use conflicts associated with located material sites, reservoirs, and other utility and service infrastructure in the Prudhoe Bay area. It is now more important than ever that support facilities and infrastructure be located as near the users as possible to reduce the costs associated with the necessary services.

Mapping and State Data

In developing the Management Plan, the State must use the most up-to-date, accurate mapping data. For example, in reviewing the

mapping information there are several secondary roads indicated that appear to actually be seasonal ice roads. It would be helpful, and more accurate, if the maps could differentiate seasonal ice roads separately from actual gravel road infrastructure. Additionally, the Plan should identify all existing material sites (open and closed) could be identified. This should also include through a table or appendix, the most up to date estimate of material at the site and material sales commitments by material site. This will help establish the need for additional material sites and their locations to minimize the surface impacts and establish a basis for planning and land use related to material availability and access.

Airports, Airstrips and Development Nodes

Transportation by air is important to many of the user groups in the planning area, and an important consideration in any Management Plan. The NSB operates many of the village airports all ready. The Borough does not necessary wish to operate more along the Dalton, but need to have apron space to access the users and provide services. A primary service that is missing today is space for first responders (either NSB Police, or State Troopers).

The Oil Industry, Guides/outfitters, scientists, subsistence users and DOT are all interested in how they operate and where. Past commentaries have listed the services that should be available at these locations - which begin to look much like development nodes. Gravel for maintenance, storage, fuel storage, waste handling and camp space are all included.

Habitat Description - Wetland Mitigation

It is important for the next phase of the North Slope Area Plan to include careful and accurate identification of Wetlands. Use the Corps of Engineers criteria will allow for identification of these locations in a way that will help establish a Wetland Mitigation Bank to offset future development in the Prudhoe Bay area.

Identification of Potential Gravel and Water Reservoir Locations

In the mapping and resource evaluation portion of this process, it will be important to include the most up to date information related to historic gravel/rip rap geotechnical evaluations. As discussed above, gravel is critical to support oil and gas development as well as for maintenance of the Dalton Highway, the east-west Spine Road and airports in the area. Water resources are also critical. The Borough as often advocated for selecting land that could have the joint benefit of serving as a regional material site and eventually a large water reservoir. Potential material sites may also have the possible future use as waster transfer locations or possibly solid waste monofills. This is always subject to permitting, but can allow for the large future volumes of waste associated with activity to be disposed of in a way that doesn't create large landfill mountains, but instead disposal sites that can be closed with limited impact on the topography of the north slope.

State Submerged Lands

With the recent approval of creation of the North Slope Port Authority(9), access to and use of certain submerged lands is now more important than ever. The Management Plan must consider locations that are potentially beneficial for long term leasing by the NSB/Port Authority. Since the plan includes a substantial amount of the coastal waters surrounding the Borough, identifying the appropriate locations and process for development will be very important. Access easements to locations of future dock or port facilities should also be a topic of discussion as the planning effort progresses.

Pre-1983 Resource Management

Regarding the issue of Pre-1983 Resource Management status of the land, this has been an issue with essentially all Borough selections since the Borough's land entitlement was reinstated by legislation in 1987. Pre-1983 Resource Management land is not directly conveyable under statute. This applies now to nearly all of the Borough's un-adjudicated selections. The response to this issue should follow the same structure that the Borough has offered during the last three decision cycles. It is a legal question that primarily relates to the scope of the LeResche Supreme Court decision.(10) The Borough has successfully argued in previous cases that the Commissioner retains the power to reclassify these lands to a conveyable status.

As the Borough understands it, the process of finally developing the North Slope Area Plan affords the Borough the chance to vacate the Pre-1983 Resource Management status on some or all lands within the planning area. This will open the door to a process in which the Borough can select the remainder of its Municipal Entitlement lands and have them adjudicated without the current limitation of reclassification.

Oil, Gas and Geothermal Resomces

The planning and decision making processes for oil, gas and geothermal resource allocation and development follow their own section of the Alaska Statutes (AS § 38.05.125 through AS § 38.05.184) as well as AS § 38.05.035. These processes are not included as part of the Department of Mining, Land and Water area plans. State land, with few exceptions, is subject to oil and gas exploration and development, either through area wide leasing under AS§ 38.05.180 or by exploration licensing under AS § 38.05.131. For these reasons the area plan does not make any allocation or development decisions regarding these resources. All decisions regarding oil, gas and geothermal resources are subject to DNR's existing oil, gas and geothermal permitting, licensing and leasing processes. Oil and gas sales are not subject to the regional planning process; instead they follow the planning process identified under AS§ 38.05.180. The land use designations of the plan are multiple use in character and do not preclude oil and gas development. The State must work to ensure that these two processes do not become disjointed, as they sometimes are. In addition, the State must ensure the Borough is an active participant in each process. Land use designations must be coordinated with land uses in a way that ensures we are all working toward the same ends.

Subsistence in a Changing Environment

Subsistence is a major concern for the people of the North Slope. The Management Plan must describe and consider the management implications of the important habitats for the various important subsistence species present within the planning area, including caribou, whales, seals, polar bear, musk-ox, furbearers, birds and fish.

Of great concern for all of our communities are the changing population numbers and geographic ranges of the various caribou herds on

the North Slope. There is a need to incorporate the latest information about each of the herds in the area plan and include guidance for authorizations issues by the Alaska Department of Fish and Game, the Borough Department of Wildlife Management and any other agencies that pertain to concentration areas and movement corridors.

It is clear from increasing studies across a wide range of disciplines that the arctic marine and terrestrial ecosystems are undergoing rapid change. The short and long term implications of this change for the wildlife resources and arctic residents who had for centuries or longer depended upon a relatively stable ecosystem cannot be reliably predicted. This unsettling reality demands that extreme caution be exercised in considering proposals for new large-scale operations within these ecosystems, like commercial hunting and fishing, marine transport, tourism, and oil and gas development.

The Inupiat have always been adaptable people. We recognize that decisions made now can have far-reaching consequences, and that it is our people that will be most directly impacted. We will remain here, and will adapt to whatever changes occur, but want to be assured of a meaningful role in the management of our homeland. That management must be adaptive and driven by the results of consistent and comprehensive scientific studies.

Conclusion

Thank you for the opportunity to comment on this initial phase of the development of the North Slope Management Plan. We look forward to continued participation in this process.

Sincerely

NOTE: Map attachment was not included with comment.

(1) DNR North Slope Management Plan Planning Update No. 1, June 2015

(2) The subsistence diet protects against obesity and diabetes, and associated problems such as hypertension and cardiovascular disease. Restricted access to subsistence foods therefore places the community at increased risk for these problems. If subsistence use in the region is reduced, very significant increases in obesity and diabetes in the impacted communities would predictably ensue. See Ebbesson SO, Kennish J et al, Diabetes is Related to Fatty Acid Imbalance in Eskimos, International Journal of Circumpolar Health, 58: 108-119. 1999); Shephard Rand Rode A, The Health Consequences of Modernization: Evidence from Circumpolar Peoples, Cambridge University Press (1996).

(3) "Environmental changes, both real and perceived, also influence health. Resource development activities and structures can change animal migration patterns due to disturbance of hunting lands also affecting consumption of traditional foods and by possibly causing hunters to travel farther out on the land, thereby increasing the risk of personal injury. Oil and gas spills could affect areas of traditional harvesting, and real or perceived contamination could impact people's desire to consume food off the land and increase the consumption of store bought foods." HABITAT HEALTH IMPACT CONSULTING/NORTH SLOPE BOROUGH, HEALTH INDICATORS IN THE NORTH SLOPE BOROUGH: MONITORING THE EFFECTS OF RESOURCE DEVELOPMENT PROJECTS, 5 (June 2014) available at http://www.north-slope.org/assets/images/uploads/NSB_Indicators_Report_August_4_printable_FINAL.pdf.

(4) AS§ 29. 18.190.

(5) 581 P.2d 1112 (Alaska 1978).

(6) See the July 9, 2002, Final Finding & Decision on ADLs 414783 and 417199: Deadhorse Lease Tracts.

(7) NORTH SLOPE BOROUGH DEPARTMENT OF PLANNING & COMMUNITY SERVICES, OIL AND GAS TECHNICAL REPORT: PLANNING FOR OIL & GAS ACTIVITIES IN THE NATIONAL PETROLEUM RESERVE-ALASKA (2014) available at

<http://www.north-slope.org/departments/planning-community-services/oil-and-gas-technical-report>.

(8) Oil and Gas Technical Report, NSB 2014, page 49.

(9) N.S.B. Ordinance 2014-01 (adopted by voters October 7, 2014 pursuant to the Municipal Port Authority Act, AS§ 29.35.600-29.35.730), codified as NSBMC Chapter 4.

(10) North Slope Borough v. LeResche, 581 P.2d 112 (Alaska 1978)

Comment 3 of 21 - submitted on 07/30/2015 at 12:00 AM:

How do you use state land?

- Trapline @ Gunsite Mt
- Geese Hunting
- Fishing

How would you like to see state lands used?

Would like to see guide services North of Anaktuvuk Pass moved west or east

What issues, if any, do you have with the current uses or management of state lands?

Would like to see guide services north of Anaktuvuk Pass moved west or east!!

Any other comments:

Same as above

Comment 4 of 21 - submitted on 07/30/2015 at 12:00 AM:

How do you use state land?

I don't use state lands for much. I drive in the city and when I do go to remote places, I watch wildlife.

How would you like to see state lands used?

I would love to see lands used to benefit the native people more, whether it be for subsistence use, or improving transportation for residents or villages.

What issues, if any, do you have with the current uses or management of state lands?

Too many regulations.

Comment 5 of 21 - submitted on 07/31/2015 at 08:54 PM:

The Brooks Range Council would like to see attention paid to the recreational, hunting and tourism access points along the Dalton Highway, specifically at the Chandalar Shelf and Galbraith Lake areas for dog mushers in the winter. The Galbraith Lake access area and spur road have been used in the winter for many years to access the Brooks Range to the west of the Dalton Highway by dog team for recreating, hunting and tourism. In the winter there is no designated parking area or facilities for dog mushers. This has not been a problem to date. All users we have encountered park their teams to the extreme western edge of the parking lot, scoop their dog waste and pick up their trash. No problem. The area is gaining in popularity though and we could foresee a day where there is conflict over the amount of parking available or in a big snow year if vehicles affect the plowing routes of DOT or whomever it is that maintains the Galbraith airport area. Please recognize the importance of this area for winter recreation access through the BLM corridor to the Brooks Range both to the east and west of the Dalton Highway and feel free to contact me directly if you need clarification of these issues. Additionally the lack of development along the Itkillik River Valley is immensely enjoyed by our members. We also see the destructive potential of the Road to Umiat and strongly recommend that it never be built. We are concerned by the cumulative affect of development on the land and animals and urge DNR to consider the North Slope Management Plan area as a whole in the planning and permitting process of any development.

Comment 6 of 21 - submitted on 07/30/2015 at 12:00 AM:

How do you use state land?

With great respect.

How would you like to see state lands used?

For up here, where we depend on animals to live on, I personally would cut off sports hunters using it.

What issues, if any, do you have with the current uses or management of state lands?

Sports hunters, guides, they r usually the first ones to catch our animals before we do. We depend on the wildlife animals, & when outsiders take advantage first, we r the ones struggling.

Comment 7 of 21 - submitted on 07/30/2015 at 12:00 AM:

How do you use state land?

For hunting and fishing and picnicking.

How would you like to see state lands used?

For subsistence use ONLY!

What issues, if any, do you have with the current uses or management of state lands?

Hunters that fly in every year from not in the village!

Any other comments:

Need to keep small aircrafts from hunting our caribou and sport hunters need to stay Away!

Comment 8 of 21 - submitted on 07/30/2015 at 12:00 AM:

How do you use state land?

Use land for subsistence & trapping.

How would you like to see state lands used?

More land added, each time the give us Rules to the land, the land gets smaller then before.

What issues, if any, do you have with the current uses or management of state lands?

North of AkP theres guide hunters ever since I cld remember we use to have lots of animals to hunt & land to hunt on. Now days we live like people who live on Reservation lands & we don't somethings wrong somewhere.

Any other comments:

More land to hunt on please.

Comment 9 of 21 - submitted on 07/28/2015 at 12:00 AM:

Dear Sirs/ Maams,

I have lived in Anaktuvuk Pass, my whole life, I'm 37. And I am writing this comment to you, concerning the sports hunters that hunt north of our village. We have herds of caribou that migrate thru here every year. The sport hunters come here/ up north of us every fall and disturb the migration route of the caribou herds, and we solely rely on caribou for our food. Just like our relatives on the ocean coast, who rely on whales for their food, we rely on caribou because we are inland Eskimos..last of the inland Eskimos! And some years, the caribou herds will not pass our area, because of the diversion from the sports hunters. And sometimes, we have to travel further and further to get the caribou. The caribou herds are important to us, that's what my relatives thrived on was caribou. That is why, my ancestors moved here, And the sports hunters who come around this area, are only interested in one thing. To hunt for fun and shoot a caribou or whatever they get just for fun. Thats why, they call it sports! They just take what they shoot, it could be horns or skin. They do not take the meat,they just leave the meat to rot!

I think that, you as a team would help us as to issue big permits/ or something to help us at least give a message to the sports hunters, that there are consequences for so called hunting for sports and fun! Thank you for reading my concerns and please take it to consideration.

Quyanaqpak (thank you)

Comment 10 of 21 - submitted on 07/31/2015 at 12:00 AM:

On behalf of the Alaska Wilderness League, Northern Alaska Environmental Center, Sierra Club and The Wilderness Society, please accept these scoping comments for the State of Alaska's North Slope Management Plan.(1) Thoughtfully analyzing the various values of the North Slope and developing management policy for these lands is complex and challenging. We appreciate the state taking the time to complete this important effort.

What follows are specific comments pertaining to State of Alaska owned lands and waters with particular relevance to the large federally administered tracts to the east, west, and north of the planning area: the Arctic National Wildlife Refuge (the Refuge), the National Petroleum Reserve - Alaska (NPR-A or Reserve), and offshore waters. Many of the conservation and subsistence values that exist on the North Slope utilize a broad landscape to complete their life cycles. As such, we encourage the state to take a proactive landscape-level approach to managing the cross-jurisdictional conservation values with your federal counterparts at the United States Fish and Wildlife Service (USFWS), the Bureau of Land Management (BLM), and the Bureau of Ocean Energy and Management (BOEM). We begin this letter with a discussion of the planning area's important conservation values, including a particular focus on watersheds, caribou, and offshore areas. Then, in the latter portions of this document, we address plan development, legal political boundaries, mitigation, climate change, the potential road to Umiat, and cumulative impacts from new oil and gas projects.

1. Important Conservation Values

As mentioned above, some of the region's highest conservation and subsistence values span across both the state's planning area and federally administered tracts. When planning for these lands and waters, an ecosystem approach should be employed to manage watersheds holistically and to account for how wildlife utilizes the entire landscape to complete their life cycles. Such natural resource planning is necessary to ensure functioning ecosystems and future subsistence resource abundance.

Watersheds

The Colville River system provides some of the North Slope's most important aquatic and terrestrial habitat. The region is well known for its raptor nesting areas, with significant proportions of several Alaskan species' populations occupying bluffs and cliffs along its shoreline.(2) The area has been recognized since the 1950s as one of the most significant regional habitats for raptors in North America.(3) The BLM's 2013 NPR-A Integrated Activity Plan recognized the importance of raptors by modifying the purpose of the Colville River Special Area to protect all raptor species (the Special Area was originally designated to protect Arctic peregrine falcons).(4) However, successfully protecting these unique resources also will require the state to do its part to conserve adjoining habitat on the east side of the river. The state's management plan should give habitat protections to this ecologically-rich area and include significant buffers from development activities along the Colville River and its tributaries.(5)

The Colville River delta, downstream of the NPR-A's Colville River Special Area and on state-administered land, is also a very ecologically important area.(6) This habitat hosts an estimated 40,000 individuals of 18 bird species during fall migration, including large numbers of American golden-plovers, dunlin, and stilt sandpipers. Additionally, the Colville delta supports a vulnerable moose population that experienced a steep decline (by 50%) in 2013.(7) The 2014 North Slope winter aerial moose census estimated total Colville River delta moose population to be smaller than has been documented since the aerial census program began in the 1970s.(8) Because of the impressive habitat and diversity of species present in the delta, the State of Alaska should address the area's wildlife, scenic, and subsistence values when considering the highest and best use of this region.

It is also important to note that the Colville River watershed provides important habitat for a number of anadromous and highly migratory species of fish, many of which are important subsistence resources. The river's ecological and physical features provide a diverse portfolio of habitats that are necessary for various species of salmon and whitefish to complete their life cycles. These areas include unique habitats for overwintering, spawning, and rearing. Protecting all of these areas is important to maintaining healthy populations.

The Colville River watershed is a prime example of the need for effective cross-jurisdictional management. The Colville River is the largest aquatic system in America's Arctic and covers approximately one third of the entire North Slope. The watershed includes federal, state, and native owned lands. To effectively manage this system and its important conservation and subsistence values, the State of Alaska should take proactive measures to protect important conservation areas and to work with partners across political boundaries.

Similarly, the aquatic systems that flow through multiple jurisdictions on the east side of the planning area should be managed holistically. Many rivers, including the Atigun, Ivisak, and Kavik, flow from within the boundaries of the Arctic National Wildlife Refuge and onto state lands. Many of these waters are managed for their wild characteristics and can be compromised if the system is not managed in a comprehensive way. Through this management plan, efforts should be made to protect these rivers' lower sections so that the watersheds' ecological and subsistence values are not harmed.

The Canning River and its delta is located within the Arctic National Wildlife Refuge; its waters enter the state's nearshore zone beyond the northwest tip of the Refuge past Brownlow Point) (see section below regarding political, legal boundaries). These federal lands and waters provide important habitat for anadromous and other fish, Porcupine and Central Arctic caribou, polar bear denning, migratory bird nesting, feeding, staging, and migration, particularly for shorebirds and waterfowl. The Refuge is a unique conservation system unit protecting an Arctic ecosystem with a full spectrum of habitats, including coastal bays, islands, and lagoons important for fish and wildlife, wilderness, subsistence, recreation, water quality and quantity, and fulfillment of international treaty obligations pertaining to wildlife. The plan needs to consider impacts on Refuge lands from adjacent state lands.

Caribou Herds

The Teshekpuk Caribou Herd is an important conservation and subsistence value that exists across political boundaries on the western side of the state's planning area. Unfortunately, the Teshekpuk Herd, the smallest of the four herds on the North Slope, has been in decline. The

latest census, conducted in 2013, estimated the herd at approximately 32,000 animals, which is less than half of the highest count of 68,000 in 2008.(9) While the federally administered area directly around Teshekpuk Lake is protected because of its importance for calving and insect relief habitat, the herd's winter range and migratory corridors are equally important to the life cycle of these animals. A significant portion of the herd crosses through and utilizes state land to reach their wintering grounds in the Brooks Range near Anaktuvuk Pass, but there are currently limited protections for these areas. (See Appendix A: Teshekpuk Caribou Herd Seasonal Distribution)

Likewise, as depicted on State of Alaska Department of Fish and Game and USFWS maps, the Central Arctic Caribou Herd utilizes a significant portion of the planning area and adjoining federal lands to the east and west to complete their life cycle.(10) This herd is known to calve in the coastal area east and west of Prudhoe Bay, to forage during the summer months as far east as the Arctic National Wildlife Refuge's Coastal Plain ("1002 Area") and as far west as Teshekpuk Lake, and then to migrate in the fall to the Brooks Range to overwinter.(11)

The Porcupine Caribou Herd's sensitive habitats for calving and post-calving are located in the Refuge's Coastal Plain.(12) The Porcupine Caribou herd's insect relief habitats extend into its lagoons and barrier islands as well as the state's nearshore waters; and the herd's range extends to the west of the Refuge's boundary and overlaps with the Central Arctic Caribou Herd on State of Alaska lands. This herd is an important subsistence resource for the local Inupiat and other residents in Kaktovik and provides vital subsistence and cultural values for the Gwich'in people in Arctic Village, Venetie, Fort Yukon, and other villages in the U.S. and in Canada.(13) This herd is important to Alaska because it has been recognized by the United States and Canada as "a unique and irreplaceable resource of great value," many Alaska Natives utilize the herd for subsistence purposes, and the herd is used for recreation, aesthetic and sport hunting purposes by Alaskans. Special attention should be given to effects of oil activities and infrastructure such as pipelines, roads, ports and aircraft on the Porcupine Caribou herd and other wildlife from development and production on the state's adjacent lands and Beaufort Sea waters. Notably, the likely methods and risks of transporting oil to shore should be considered given Refuge prohibitions on oil development and production.(14)

This management plan should take proactive measures to protect the physical and natural values that these herds require to thrive. The plan should give special attention to important calving, post-calving, insect relief, overwintering, and migratory corridors and classify these for habitat protection. Efforts should be made to ensure connectivity between all of these areas so that infrastructure does not impede or disrupt these animals and their movements.

We also encourage the state to ensure ongoing monitoring of herd movements which may change in upcoming years due to climate change. The plan should build-in some flexibility to address future changes in caribou land use patterns.

Offshore Areas

When considering offshore leasing, it is critical for the state to consider the land use and protective status of the adjacent coastline. State waters adjacent to state lands open to oil and gas development are appropriate locations for additional leases.(15) The infrastructure needed to allow offshore development in state waters - including pipelines to transport oil and spill response equipment - are located nearby.

State waters of the Chukchi and Beaufort seas adjacent to federal lands not open to development should not be leased. Specifically, the state should not lease state waters adjacent to federal lands in the NPR-A which are unavailable for leasing or exploratory drilling and where no new non-subsistence infrastructure is allowed,(16) and state waters adjacent to the Arctic National Wildlife Refuge. The officially-designated Special Areas in the NPR-A and the coastal plain of the Refuge are ecologically important and sensitive regions, as well as areas key to subsistence. Both the Refuge Coastal Plain ("1002" area) and designated Wilderness east of this to Canada are closed by law to oil and gas exploration, development and production so this needs to be taken into account in planning and analysis of the impacts of oil and gas operations on adjacent State of Alaska Beaufort Sea leases. Allowing offshore development in state waters near these areas would adversely impact them through potential contamination, through vehicle access to the state waters, through disturbance to fish and wildlife habitats and subsistence resources and uses, and in other ways. Note that this recommendation for the North Slope Management Plan does allow a substantial portion of state waters adjacent to the NPR-A Chukchi Sea coastline to be leased by the state.

Additionally, the State of Alaska needs to utilize planning measures, including land use allocations and management prescriptions, which protect offshore resources. Bowhead whales - a critical subsistence resource - migrate, feed and calve close to shore, and those areas need to be protected. Barrier islands which support bowhead hunting include, but are not limited to, Cross Island. Barrier islands and buffer zones around them should not have leases.

Relevant Map

Included with this letter is a basic map that depicts a large portion of the North Slope. The map shows the Colville River watershed, a portion of the Teshekpuk Caribou Herd's late summer and southeast winter range, and Nuiqsut's subsistence use area. These values are laid over the three primary ownership categories in the region: federal, state, and native. As you can see, many of the values discussed above cover more than one jurisdiction. We encourage you to consider this map when thinking about how resources should be managed for conservation, subsistence, and development activities at a landscape-level. (See included map: Cross-Jurisdictional Values)

2. Comments on Plan Development

In addition to addressing the conservation values, our organizations would like to see the plan identify areas important for hunting and fishing and other traditional use and cultural activities and to establish buffer zones to protect those areas.

Furthermore, we encourage state planners to not only identify areas of importance, but also to take constructive efforts to improve resource management through land classification and management prescriptions. As part of this process, the state should work with relevant staff at the Alaska Department of Fish and Game and the Alaska Department of Natural Resources to develop the appropriate land classifications for wildlife habitat and subsistence resources and uses and incorporate detailed management prescriptions for areas of high conservation and subsistence value. Such prescriptions will help to ensure the sustained stewardship of various aquatic and terrestrial resources. Taking steps to ensure natural resource protections now can help protect important fish and wildlife habitat, and reduce conflicts between stakeholders in the future.

Additionally, to improve understanding and management of lands by the public and to ensure consistency, we encourage the State of

Alaska to use similar designations as the BLM for the federally administered lands of the NPR-A. On these lands, BLM has designated lands under four broad categories: "Special Areas" which represent areas of high ecological and subsistence importance, "lands unavailable for leasing and no new non-subsistence or exploratory drilling," "lands unavailable for leasing or exploratory drilling," and "lands available for leasing and development activities". The state should refine the specificity of its land classification techniques to include this level of detail. Such designations will allow for a clearer and more holistic understanding of how lands across the North Slope are to be utilized for development and protected for their natural values.

3. Political Boundaries

On the state's "North Slope Management Plan - Boundary Map,"(17) the state incorrectly depicts a portion of the northwestern boundary of the Arctic National Wildlife Refuge. Specifically, the state's planning boundary includes a portion of the Arctic National Wildlife Refuge, a federal conservation system unit, when it should not because federal lands are explicitly not included in the planning process. While the State of Alaska has asserted claims to approximately 23,000 acres in the Canning River delt , the issue has not been formally resolved. Since 1960, the boundary line of the Arctic National Wildlife Refuge/Range has been the far western-most channel of the Canning River also known as the Staines River tributary of the Canning River; unless deemed otherwise, the federal, legal, long-standing border should be respected through this planning process.

4. Mitigation

As you may be aware, the BLM is in the midst of developing a Regional Mitigation Strategy (RMS) for the NPR-A. The impetus to create this document emerged from ConocoPhillips Alaska Incorporated's Greater Mooses Tooth One project, the first oil development on federal lands with the NPR-A. The RMS process seeks to take a true landscape-level approach to planning with the goal of improving certainty and permitting speed for industry while protecting conservation values and ensuring habitat functions.

The BLM's Regional Mitigation Strategy may allow for opportunities to improve management of resources across political boundaries. Unlike in the past where compensatory mitigation dollars from Clean Water Act compliance on the North Slope may have been collected and directed towards conservation in other parts of the state, the BLM's mitigation initiative may provide mechanisms to keep mitigation dollars in the region. This approach could help protect not only high conservation and subsistence values within the NPR-A, but also areas outside the Reserve on state and native owned lands. Such actions would foster a true landscape-level approach to the management of resources that cross multiple jurisdictions. A potential example may be the collection of mitigation funds from federal lands being used to finance or incentivize actions to protect habitat integrity within the states planning area.

While working to complete the North Slope Management Plan, we encourage the State of Alaska to communicate with BLM to explore constructive mitigation opportunities where an ecosystem approach can be taken to ensure sound stewardship and responsibly-sited development on Alaska's public lands. Effectively classifying lands for their importance and allowing opportunities for partnerships would be a constructive step in reducing conflict and ensuring that natural resources and processes are protected.

5. Climate Change

Climate change, and its effect on the region, is a factor that the State of Alaska should also consider when completing this plan. While we understand that your planning efforts focus on the current ("snapshot") condition of the landscape, steps can be taken to proactively protect state resources in a warmer and climatically uncertain future. Ecological systems that are healthy, not fragmented, and functioning will have the greatest chance of effectively adapting to future conditions. Generally, these conditions are captured in large contiguous blocks of land. As such, we encourage the state to be conservative in how habitat is protected and managed considering the region's uncertain future.

6. Potential Road to Umiat

Our organizations are concerned that a road to Umiat from the Dalton Highway is unnecessary and will adversely impact subsistence by creating ease of access for non-local hunters and fishermen, and would likely adversely impact caribou movement. Oil development in and around Umiat can occur without such a road, with ice roads supporting exploration and with an oil pipeline without an adjacent road allowing production to reach TAPS.

7. Cumulative Impacts from New Oil and Gas Projects

Alaska Department of Natural Resources' information for this plan does not clearly describe whether or how it will address cumulative impacts from new oil and gas exploration, development and production. This vital analysis should be conducted for each major new oil production expansion, particularly into new sites and geographic areas, and not only in a one-time analysis.

We look forward to continuing our participation as this plan moves forward. Please do not hesitate to reach out if you have any questions or if we can be helpful in any way. Thank you again for your hard work and efforts.

Sincerely

Attachments: Appendix A: Teshekpuk Caribou Herd Seasonal Distribution maps; and, Cross-Jurisdictional Values map

(1) See: http://dnr.alaska.gov/mlw/planning/mgtplans/nsmp/pdf/nsmp_dear_alaska_letter.pdf

(2) National Petroleum Reserve - Alaska Integrated Activity Plan, 2013, U.S. Department of the Interior, Anchorage, Alaska, vol. 1, p. 270. See: <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=5251&dctmId=0b0003e8800fbba3>

(3) National Petroleum Reserve - Alaska Integrated Activity Plan, U.S. Department of the Interior, Anchorage, Alaska, 2013, vol. 1, p.355. See: <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=5251&dctmId=0b0003e8800fbba3>

(4) National Petroleum Reserve - Alaska Integrated Activity Plan Record of Decision, February 21, 2013, p. 4. See: <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=5251&dctmId=0b0003e8800fbba3>

(5) For example, management prescriptions and stipulations, see: National Petroleum Reserve - Alaska Integrated Activity Plan, Record of Decision, 2013, U.S. Department of the Interior, Anchorage, Alaska, Appendix A. Available at: <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=5251&dctmId=0b0003e8800fba3>

(6) The Environmental Protection Agency and US Fish and Wildlife Service recognized the Colville River Delta as an Aquatic Resource of National Importance (ARNI) in 2010.

(7) Jillian Rogers, Agency cancels moose hunts, Arctic Sounder (May 30, 2014), http://www.thearcticsounder.com/article/1422agency_cancels_moose_hunts.

(8) Id.

(9) Caribou Trails, Issue 14 Summer 2014, p. 3. For a slightly different figure, see North Slope Caribou in Decline, NSB Department of Wildlife Management Newsletter (Spring 2014) http://www.north-slope.org/assets/images/uploads/2014_Spring_DWM_newsletter_FINAL.pdf (stating that the Teshekpuk Lake herd declined from a peak of 64,000 in 2008 to 39,000 in 2013).

(10) See maps at: http://www.adfg.alaska.gov/index.cfm?adfg=wildlifeneews.view_article&articles_id=678 and <http://www.fws.gov/refuge/arctic/caribou.html>

(11) United States Fish and Wildlife Service, Arctic National Wildlife Refuge. (December 26, 2013). "Caribou". Retrieved from: <http://www.fws.gov/refuge/arctic/caribou.html>.

(12) See: <http://www.pcmb.ca/documents/Sensitive%20Habitats%20of%20the%20Porcupine%20Caribou%20Herd%20booklet.pdf>.

(13) <http://ourarcticrefuge.org/wp-content/uploads/2012/10/GSChumanrightsreport.pdf>.

(14) See: Trustees for Alaska v. State, DNR, 865 P.2d 745 (1993) Demarcation Bay and Trustees for Alaska v. State, DNR, 795 P.2d 805 (Alaska 1990) Camden Bay,

(15) This does not include the State's asserted claims to lands on lease tracts within the Arctic National Wildlife Refuge including those incorrectly depicted on ADNR Division of Oil and Gas tracts maps that extend within the Refuge.

(16) National Petroleum Reserve - Alaska Integrated Activity Plan Record of Decision, U.S. Department of the Interior, Anchorage, AK, Map 1: Land Allocations, p. 104 (February 21, 2013). See https://eplanning.blm.gov/epl-front-office/projects/nepa/5251/42462/45213/NPR-A_FINAL_ROD_2-21-13.pdf.

(17) See: http://dnr.alaska.gov/mlw/planning/mgtplans/nsmp/pdf/nsmp_boundary_map.pdf

Comment 11 of 21 - submitted on 07/28/2015 at 12:00 AM:

The Native Village of Nuiqsut (NVN), a BIA federally recognized tribe, wishes to express their gratitude for the opportunity to comment on the potential issues addressed in the State of Alaska Department of Natural Resources North Slope Management Plan as presented in Nuiqsut, Alaska on April 13, 2015.

The following represents our comments on the information presented in Nuiqsut on April 13, 2015, and on the Department of Natural Resources documentation provided on the North Slope Management Plan website.

1) How We See Use of State Lands

The NVN understands and appreciates that principles of State land use are specified by the Constitution of the State of Alaska under Article 08 - Natural Resources. The NVN also understands the mandate for development of resources which is consistent with public interest as specified under Section 8.1, and the concepts of Public Domain with respect to decisions regarding land use.

At the same time, Section 8.4 of the constitution states clearly that "fish, forests, wildlife, grasslands, and all other replenishment resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses." The sustained yield principle is defined as a controlled yield of capital that does not reduce the base of that capital itself; that is, utilizing a resource at a rate that maintains ecosystem services at the same or increasing levels over time, understanding that the yield allowable to maintain such balance varies as the ecosystem responds to a variety of environmental factors such as natural climate variability and anthropogenic climate change.

Based upon the Constitution of the State of Alaska, NVN feels very strongly that State land use decisions should follow the sustained yield principle, and that local residents of State lands within the North Slope region be allowed some influence over land use within their own homelands since it directly impacts tribal quality of life.

2) How We Would Like to See State Lands Used in the Future

We would like to see State land use in the future follow the sustained yield principle, and that North Slope residents are provided appropriate influence in the decision-making process regarding State land use in their local area.

3) Issues Regarding the Use of State Lands and Resources

From the NVN's perspective, the primary issues regarding use of State lands are related to: a) the appropriate balance of economic development (industrial and recreational) and ecosystem maintenance; and b) the ability of local residents to have appropriate input on decisions that affect their quality of life.

The problems faced in dealing with the former issue (a) can be driven by the economic situation within the State at the time land use decisions are made, as revenue deficits could result in decisions more favorable to generating revenue than the sustainable yield principle. This is of concern to the NVN.

The latter issue (b) is a bit more complex in that Alaska residents are not homogeneously impacted by local land use. For example, development 20 miles from a local North Slope community would likely have far greater impact on that community than development 20 miles from a local residence in Anchorage, simply because the people of the North Slope depend far more on traditional subsistence

resources than do the people of Anchorage. There are no special considerations for this principle in the State constitution, as all residents are expected to have equal say regarding use of State lands within the Public Domain. Whether local subsistence dependents should have more control over State land use in their own regions can be debated ad infinitum; however, it is certainly an issue for the people of the North Slope and a major concern for the NVN.

4) Comments on Specific Points Provided During the Presentation

4a) "Planning is a way of sorting through the possibilities for using State land, determining those uses with the greatest benefits to all Alaskans, and involving the public in that process."

The NVN very strongly supports public process, and feels that adequate notice must be provided for all meetings and comment periods during each step of planning. It is crucial that tribal organizations are kept current with all details involved in the process.

4b) (The plan) "serves as a basis for long-term management of State land and water in the planning area."

The NVN is very sensitive to issues involving the relationship between the sustained yield principle and water in the planning area; especially groundwater. Ground water is a precious resource on the North Slope, and land uses that result in fresh water mining will have a very significant impact on the hydrological regime; including the ability of salt water to intrude into existing freshwater reservoirs (both fresh surface and groundwater).

4c) While the plan does not specifically "address oil and gas leasing," oil and gas development must be a crucial component in any State land use plan for the North Slope.

It is the strong opinion of NVN that oil and gas exploration and development be conducted through the sustained yield principle, especially with respect to development density and the cumulative impacts development have upon the ecosystems that support traditional subsistence resources of the tribal people of the North Slope. The NVN believes that the spatial density of gas and oil development projects is crucial in maintaining the sustained yield principle, and that oil and gas development is the single most significant threat to this principle when development densities become too large.

5) Other Comments

The NVN wishes to express the following concerns and suggestions regarding State land use on the North Slope:

5a) The NVN favors a guide concession permitting plan to control the negative repercussions of a large number of non-North Slope residents competing with tribal members for the limited subsistence resources that sustain them.

5b) The NVN is concerned about maintaining the environmental integrity of the Dalton Highway corridor; with ATV access a primary concern.

5c) The NVN is concerned with coastal erosion problems that will result in a loss of freshwater resources due to saltwater intrusion.

5d) The NVN is concerned about the potential negative impacts of a permanent road to Nuiqsut; understanding positive potential benefits exist as well.

5e) The NVN is concerned with the hydrologic impacts of realizing the Colville River gravel potential.

5f) The NVN is very sensitive to the negative impacts of aviation operations on local wildlife; especially with respect to wildlife movement and migration routes.

5g) The NVN is concerned about the increase in airboat traffic, with direct impacts on wildlife.

5h) The NVN feels that integrity of traditional tribal camp sites should be protected.

5i) The NVN favors buffers to protect subsistence areas from the impacts of oil and gas development.

5j) The NVN does not support a Road to Umiat due to the potential impacts of industrial development on downstream hydrology and increase of access for non-North Slope residents to North Slope subsistence resources.

Respectfully submitted

Comment 12 of 21 - submitted on 07/30/2015 at 12:00 AM:

How do you use state land?

If we were to go there, we would use it with respect.

How would you like to see state lands used?

Put restrictions on state land not to hunt prior to July to October migration time.

What issues, if any, do you have with the current uses or management of state lands?

My issues are to respect the Nunamiut people who hunt on our land, the migration route should always be respected accordance to our ancestors that their law (our ancestors) as they put it.

Any other comments:

Respect our hunting tradition!!!

Comment 13 of 21 - submitted on 07/30/2015 at 12:00 AM:

How do you use state land?

Hardly cause they are south of here. Use to trap there long ago but moved to another place after 2 wolves were taken from my traps.

How would you like to see state lands used?

By resident instead of hunters guides unless the guides are from AkP.

What issues, if any, do you have with the current uses or management of state lands?

The hunter guides affect the migration of the coming from mouth of the fall time want to see the state hire residents to be with the hunter guide while they are up there.

Any other comments:

Want to see the state stop leasing lands in state unless they are okayed by AkP residents.

Comment 14 of 21 - submitted on 04/29/2015 at 12:00 AM:

We the Nunamiut of Anaktuvuk Pass solely depend on the animals to provide food to our families, especially caribou. There is a season for catching either males or females. The prime time for a good catch is in the fall. This is when the migrating herds come through our valley and the bulls are very healthy. Our people settled here in Anaqtuuvak (meaning where caribou drop their poop) Pass, right at the heart of the migrating caribou. It's been a traditional law for generations and generations to not hunt north of our valley and also let the first herds pass through. This was taught well to our people to ensure the migrating trails are imprinted for the thousands and thousands to come right after. This is a vital law of our people. If there was any diversion to miss our valley, it always meant a struggle to our people who rely on subsistence.

I like to think of this as the foundation of our people, the Nunamiut (Inland Eskimos). This is the very grounds that hold our people up, to survive throughout the year. The dependence of caribou to provide is vital, as it is our main diet. This tradition is still being passed down, the law of refraining from the first herds and abstaining from north of our Pass during the fall season. Our past leaders (forefathers) who knew the ways of the caribou and the behavior of their trails were wise to settle in the heart of the migrating herds. The elders have diagnosed the behavior of the caribou and prescribed the traditional law to supply our harvest during this prime time. This is our Inupiaq family mission for our people. Because of our hunting tradition, we respect the laws that were set by our leaders from the past and present. Each and every one of us avoids traveling north of our valley and also refrain from the first herds that pass through. This is being taught down the line of our families.

I'd like to inform the Department of Natural Resources of the Sports Hunters Base camp thats about 33 miles north of our village. This is owned and operated by Phyll Byrd, an Alaska Guide Hunter.

Since our people strongly respect and honor our traditional teaching of refraining from northward of our pass, during the fall migration season, we believe his camp is a factor in diverting our caribou from going into our Pass. Since this is state lands, and you all are receiving comments, please advise to the proper division of our matter thats effected our subsistence harvest for the past years and years.

I don't know whether he owns the property or if he gets a permit from the state on a yearly basis. If you can help in any way, i'd appreciate it.

Comment 15 of 21 - submitted on 07/30/2015 at 12:00 AM:

How do you use state land?

For hunting food for my family and getting skins for clothing.

How would you like to see state lands used?

For Alaskan citizens to hunt on for food and fur. No out of state people unless they live in Alaska for 1 year previous hunting.

What issues, if any, do you have with the current uses or management of state lands?

No out of state citizens should hunt or fish in northern Alaska. Arctic circle on north to the coast.

Any other comments:

Northern Alaska from Arctic circle on northward should be restricted to Alaskan citizens or Natives.

Comment 16 of 21 - submitted on 07/30/2015 at 12:00 AM:

How do you use state land?

Go out geese hunting during the spring time also the caribou that go by to migrate up north

How would you like to see state lands used?

No sport hunters using the land during the migration back down south. Like to have sport hunters not to use or go hunting up north. Cause it effects our subsistence here in AkP.

Comment 17 of 21 - submitted on 07/31/2015 at 08:38 PM:

Hello,

Locals should be allowed to hunt on the North Slope, and guide hunters should be allowed to hunt on the North Slope. I do not believe that they are going to make the caribou herds quit coming through the AKP valley. There certainly is some animosity between guide's and locals - however, I see the relationship as being beneficial to both - the guide bring business to AKP, and AKP provides a place for the guides to fuel up and add another touristy stop for the clientele. In a perfect world the guides would all be Alaskan residents. I would suggest adding a fee to non-Alaskan guides, as i think it would help appease the local residents. However, the North Slope belongs to the whole state - not just the people that live here - and the caribou do not belong to any of us.

Thank you

Comment 18 of 21 - submitted on 07/30/2015 at 12:00 AM:

How do you use state land?

Subsistence hunting, hiking, snowboarding.

How would you like to see state lands used?

I would appreciate the state land to be properly supervised and preserved.

What issues, if any, do you have with the current uses or management of state lands?

Allowing a large number of sport hunters and game tags.

Comment 19 of 21 - submitted on 07/30/2015 at 12:00 AM:

How do you use state land?

Subsistence uses hunting and fishing

How would you like to see state lands used?

Alaska natives hunting and fishing for subsistence

What issues, if any, do you have with the current uses or management of state lands?

Sport hunters killing for antlers

Any other comments:

We live off the land in this village. 300 plus live here only 50 job. Sport hunter killing off or land is making us suffer they want to shoot something wolves are giving us hunter hell to killing caribou for fun.

Comment 20 of 21 - submitted on 07/30/2015 at 12:00 AM:

How do you use state land?

Hunting, camping, fishing, picnic

How would you like to see state lands used?

To only be used by residents and people who have Alaska native blood! No outsiders. No sport hunting. Us natives not even getting any trophy bulls like them sport hunters. FOR SUBSISTENCE USE ONLY.

What issues, if any, do you have with the current uses or management of state lands?

There's no type of wildlife enforcement at all! How do you know if any illegal action is going on if you don't inspect them at all? Also allowing permits, gametags, guide camps to people who aren't here 3/4 of the year! Also have a big issue with them sport hunters in how they use the land! Nothing being monitored for illegal hunting!

Any other comments:

Sport hunting camps should not even be up during caribou migration Aug Oct by Alaska Statute, subsistence rights over anything, so therefore listen to the subsistence hunters! The reason for late caribou migration is sport hunters (hunters who catch the biggest bulls, if you didn't know) We don't catch the bulls therefore we will catch the females. I also want to say please extend "controlled use area". At least change the rules & regulations how the hunters can be the only ones hunting. Only way to stop the caribou decline, STOP THE SPORT HUNTERS . . . PLEASE

Comment 21 of 21 - submitted on 04/01/2015 at 12:00 AM:

The Alaska Trappers Association represents trappers across the state, including the areas identified in the scope of your planning. In past DNR planning processes, the agency has tended to discount or ignore trapping as a significant use of wildlife, normally only mentioning hunting, fishing and wildlife viewing.

Ironically, for most of the year, ONLY trappers are out utilizing most of this land. We would appreciate that any time you reference human uses of wildlife, you recognize trapping as a primary use and actually include it in your written descriptions.

We also request that you remember that your agency is tasked with providing Trapping Cabin Construction Permits (TCCP.) Please include consideration of this authorized traditional land use in the appropriate Classifications.

As your process progresses, we will be glad to review it and point out the specific places and situations where trapping interests, including TCCPs will need to be included.

Thank you for allowing us to comment. We look forward to further involvement as your efforts progress.

Sincerely