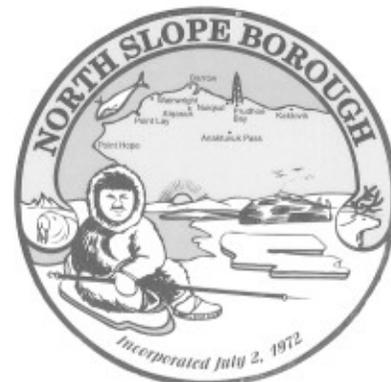


# North Slope Borough

## OFFICE OF THE MAYOR

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*Edward S. Itta, Mayor*

June 6, 2008

### **Sent by Email and U.S. Mail**

Larry Hartig  
Commissioner  
Alaska Department of Environmental Conservation  
555 Cordova Street  
Anchorage, Alaska 99501

**RE: Alaska Risk Assessment of Oil & Gas Infrastructure**

Dear Commissioner Hartig:

The North Slope Borough (NSB) supports Governor Palin's initiative to conduct a risk assessment of the State's Oil and Gas Infrastructure and the Alaska Department of Environmental Conservation's (ADEC's) outreach effort to ensure stakeholder participation in this study. I accept your invitation to play a key role in the local government advisory group and have assigned Johnny Aiken, NSB Director of Planning and Community Development, to take the lead role for the NSB on this project. I also encourage you to invite our tribes, Native Villages and cities to participate in this study.

While I support the overall goal of conducting a risk assessment of the State's oil and gas infrastructure, I am concerned about the proposed scope and amount of funding allocated to this project and wanted to share my concerns with you early in the process.

### **Risk Assessment Scope:**

The vast majority of the North Slope's people are Inupiat Eskimos. The Inupiat have inhabited the Arctic for thousands of years, traditionally following animal migrations and

subsisting on whale, caribou, walrus, seal, birds, fish and other marine, terrestrial, and riverine animal and plant species. The ocean is our garden and plays a critical role in our cultural way of life. While we have supported development of oil and gas infrastructure onshore, we have consistently opposed offshore development, because of the risk of an industrial accident and the devastating impact it would have on our environment, wildlife, culture, and subsistence way of life.

The Arctic Ocean is a complex and fragile ecosystem that supports a multitude of unique fish and wildlife species. Polar bear, walrus, seal, fish, and the bowhead whale thrive in these waters. In winter months, when temperatures may plummet to 60 below zero, the Arctic seascape is dominated by ice in a variety of ever-changing forms and concentrations, such as pack ice, broken ice, and slush ice. In the ice shear zone, relatively stable land-fast ice can interact violently with a mobile icepack with potentially destructive consequences. Extreme weather conditions, such as high winds, fog, temperature and ice conditions create significant risk to oil and gas infrastructure. Historically these risks and limitations have been underestimated and misunderstood by the state and federal governments, and industry when approving projects to operate in the Beaufort Sea.

The greatest risk to our people and our environment is the risk of an oil spill or industrial accident in the Arctic Ocean. We are also very concerned about this risk in relation to important river and lake systems that we rely on for subsistence. ADEC has proposed to exclude marine transportation, offshore exploration and future development from this study. This causes me great concern, because over the past few years there has been a massive increase in offshore exploration, development and marine traffic. We strongly recommend these topics not be eliminated from this study.

The risk assessment should include offshore exploration, all offshore development (existing and currently in the permitting process) and marine transportation. This assessment should also examine the risks infrastructure creates to nearby important river and lake systems that we rely on.

**Risk Assessment Funding:**

I am concerned about the amount of funding that the state has allocated to this important project. \$4,000,000, while a good beginning, is insufficient to complete a high quality risk assessment for all of Alaska's oil and gas infrastructure. I am concerned that this small amount of funding will be spread thinly across the state resulting in only a cursory examination of North Slope risks, and will not be sufficient to independently collect data and complete a thorough engineering assessment. High quality risk assessments can cost several million dollars for a single oil and gas operation. I recommend we re-examine the amount of funding needed to develop a high quality, independent study after the initial scoping work is completed in 2008.

The NSB looks forward to working closely with the state on this important project. Please

contact Johnny Aiken at (907) 852-0440 to further discuss our involvement and comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward S. Itta", with a long horizontal flourish extending to the right.

Edward S. Itta  
Mayor

cc: Sarah Palin, Governor, State of Alaska  
Price Leavitt, Executive Director, Inupiat Community of the Arctic Slope  
Johnny Aiken, NSB Director of Planning and Community Development  
Taquilik Hepa, NSB Director of Wildlife Management  
Bessie O'Rourke, NSB Attorney  
Andy Mack, NSB Mayor's Office  
George Paneak, Mayor, City of Anaktuvuk Pass  
Herman Kignak, Mayor, City of Atkasuk  
Mike Stotts, Mayor, City of Barrow  
Thomas Olemaun, President, Native Village of Barrow  
Freddie Aishanna, Mayor, City of Kaktovik  
Sam Kunaknana, Mayor, City of Nuiqsut  
Steve Oomittuk, Mayor, City of Pt. Hope  
Fredricka Stalker, Native Village of Point Lay  
Joseph Ahmaogak, Mayor, City of Wainwright  
James Brower, President, Native Village of Atkasuk  
Robert Ahgook, President, Anaktuvuk Pass Tribal Council  
Leonard Lampe, President, Native Village of Nuiqsut  
June Childress, President, Wainwright Tribal Council  
Charlie Kineeveauk, President, Native Village of Pt. Hope  
Isaac Akootchook, President, Native Village of Kaktovik