



Lily Tuzroyluke  
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03/22/2010 04:17 PM

To: R10OCSAirPermits@EPA

cc

bcc

Subject: Native Village of Point Hope: Comments

1 attachment



Shell Beaufort Air Permits March 2010.doc

March 22<sup>nd</sup>, 2010

### VIA EMAIL AND REGULAR MAIL

EPA Region 10  
Shell Beaufort Air Permit  
1200 6th Ave, Ste. 900, AWT-107  
Seattle, Washington 98101  
Email: [R10ocsairpermits@epa.gov](mailto:R10ocsairpermits@epa.gov)

**Re: Proposed Outer Continental Shelf Prevention of Significant Deterioration Permit Number R10OCS/PSD-AK-2010-01**

The Native Village of Point Hope is a federally recognized tribal government under the 1934 Indian Reorganization Act, as amended in 1936 for Alaska Natives, that is responsible for the well being of its 950 members. It is also the oldest continuously inhabited village in all of North America. For thousands of years, our members have harvested the sea. We preserve our traditional way of life, hunting bowhead whales, walrus, seals, polar bears, and beluga whales, as well as various fish and sea birds. Where we live, a half-gallon of milk costs nine dollars, and families depend on subsistence hunting as a source of healthy food. Subsistence resources are so vital to our well being that if the health of the ocean deteriorates, so will the physical health of our people. Yet, the importance of hunting, whaling, and fishing runs much deeper. They are central to our culture as a way to celebrate our heritage and maintain ties within our community. We view the ocean as our garden. It is what sustains us physically and spiritually as individuals and as community members.

We are deeply concerned about the proposal by Shell Oil to conduct exploratory drilling in the Beaufort and Chukchi seas in 2010 and beyond. The increasing industrialization of the Arctic Ocean threatens our health and culture. Shell may add thousands of tons of harmful pollutants to the air we breathe. It may emit large amounts of fine particulate matter, which scientists have strongly linked to increased mortality rates, and nitrogen oxides, which can result in substantial ozone formation that is itself a serious health hazard linked to increased asthma rates. Shell's operations will also cause our climate to change. Certainly, the Arctic is already changing rapidly, straining the web of life that sustains us. We see the results of the melting sea ice on almost a daily basis. We face severe erosion, stronger storms, and more dangerous seas. We see a decline in the health of the species we rely on for subsistence, and fear for our communities in turn. Shell's operations will only worsen this, emitting large

amounts of black carbon, which is one of the most important drivers of Arctic climate change, and about 94,000 tons per year of carbon dioxide.

We join in the March 22<sup>nd</sup>, 2010, comments by conservation groups on the proposed permit. The proposed permit that EPA has released does an insufficient job of protecting our air and health. We urge EPA not to permit Shell's operations in the Beaufort Sea. EPA should engage with other agencies to prepare an EIS analyzing the environmental impacts of Shell Oil's drilling program in the Beaufort and Chukchi seas. If EPA does continue with the permitting process, EPA must correct the identified errors and omissions before issuing a permit.

We will do everything in our power to protect our water, land, and way of life and hope that EPA will address our concerns. We look forward to meeting with your agency on this important issue.

Respectfully yours,

Lily H. Tuzroyluke  
Executive Director, Native Village of Point Hope

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Lily H. Tuzroyluke, Executive Director  
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